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Ameren Missouri

**Renewable Energy Standard
Compliance Report
2011**

Prepared in Compliance with 4 CSR 240-20.100

April 16, 2012



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Introduction

The Missouri Renewable Energy Standard (MoRES or RES) began as a public initiative and was placed on the Missouri ballot during the November 4, 2008 election. Labeled as Proposition C, it requires the three investor owned utilities (IOUs) in the state (Ameren Missouri, Empire District and Kansas City Power & Light) to procure renewable energy resources as a percentage of the total retail sales that each utility makes to its customers in the state.

After an extensive rule making process involving stakeholders from the Missouri Public Service Commission, the PSC staff, Office of Public Council, MIEC, MEDA, the three IOUs, various wind, solar and biomass developers, etc., the Public Service Commission published final rules on July 7, 2010.

As part of the statute and rule making, Section (7) (A) 1 requires that the IOUs file a report on the status of the electric utility's compliance with the renewable energy standard for the most recently completed calendar year.

There are two basic forms of compliance that are required under the RES. Compliance with what we term the "non-solar" RES relates to compliance using renewable energy credits (RECs) and/or actual energy that includes the REC from all forms of qualified renewable generation resources (wind, hydro, biomass, etc.) as certified by the Missouri Department of Natural Resources (DNR). There is a separate component, the "solar" RES that requires compliance which can only be met with solar RECs or actual energy that includes the REC from solar generation resources.

The following table details the renewable percentage requirements of the retail electric sales for the non-solar and solar RES:

<u>Time Period</u>	<u>Non-Solar</u>	<u>Solar*</u>
2011-2013	2%	2%
2014-2017	5%	2%
2008-2020	10%	2%
2021-forward	15%	2%

*(Solar percentages are applied to the non-solar RES amounts)

As referenced above, the DNR is responsible for determining all eligible renewable resources that can be utilized by the IOUs in meeting the requirements of the RES. DNR rule 10 CSR 140-8.010 (2), contains the list of all eligible renewable resources allowed to meet the compliance with the RES.

Ameren Missouri's compliance with the RES, as demonstrated in this report, adheres to the use of only those renewable resources as currently defined by the above referenced rule and certified by the MoDNR.

In addition, the RES rules allow for the banking of RECs for up to a three year time period. This has allowed the use of eligible RECs generated from January 1, 2008 to the current time period in meeting the RES requirements for calendar year 2011.

Any generation and/or RECs from a Missouri renewable resource are entitled to a factor of 1.25 applied to each MWh.

The following information in this report will demonstrate the specific means in which Ameren Missouri met its obligations under both the non-solar and solar RES for 2011, the first year of required compliance.

RES Compliance

Section (7) (A) 1 A

Total Retail Electric Sales

Ameren Missouri reports its total retail electric sales annually to the Federal Energy Regulatory Commission (FERC) in a report called the FERC Form 1. For the reporting year ended December 31, 2011, Ameren Missouri's total retail electric sales were 37,428,457 MWhs.

Section (7) (A) 1 B

Total Jurisdictional Revenue

Total sales to ultimate consumers as reported on the FERC Form 1 for the CY 2011 and associated with the above referenced MWhs were \$2,809,322,426.

Section (7) (A) 1 C

Retail Sales Supplied by Renewable Resources

Ameren Missouri is the owner and operator of the Keokuk Hydro-electric Generation Station located on the Mississippi River in Keokuk, Iowa. The station consists of 15 separate generators. The individual nameplate ratings range from 7.2 to 8.8 MWs.

The Keokuk Hydro-electric Generation Station was certified as a qualified renewable energy resource by the MoDNR on September 28, 2011. The total generational output from the Keokuk facility for the CY 2011 was 910,045 MWhs.

In June, 2009 Ameren Missouri and Pioneer Prairie Wind Farm I LLC entered into a 15 year power purchase agreement. Ameren Missouri is purchasing 102.3 MWs of nameplate generation from the Pioneer Prairie Wind Farm consisting of 65 turbines, located in north east Iowa. The facility site covers approximately 10,000 acres of land located in Mitchell County, Iowa in Wayne and Stacyville Townships.

The Pioneer Prairie Wind Farm was certified as a qualified renewable energy resource by the MoDNR on September 28, 2011. The total generational output from the Pioneer Prairie Wind Farm supplied to Ameren Missouri customers for the CY 2011 was 288,483MWhs.

In December, 2010 Ameren Missouri completed construction of approximately 100 kW of various PV solar technologies at its headquarters office building. The Ameren Missouri headquarters solar installation was certified as a qualified renewable generation facility by the MoDNR on September 28, 2011. The total

generational output of this facility during CY 2011 was 113 MWhs. In accordance with RSMo 393.1030, and as this facility is located in the state of Missouri, a factor of 1.25 is applied to the generation from this facility such that the generation counts as 141 MWhs towards the compliance requirements.

Section (7) (A) 1 D

RECs Created by Utility Owned Renewable Resources

Ameren Missouri is the owner and operator of the Keokuk Hydro-electric Generation Station located on the Mississippi River in Keokuk, Iowa. The station consists of 15 separate generators. The individual nameplate ratings range from 7.2 to 8.8 MWs.

The Keokuk Hydro-electric Generation Station was certified as a qualified renewable energy resource by the MoDNR on September 28, 2011. The total generational output from the Keokuk facility for the CY 2011 was 910,045 MWhs.

The value of the energy generated by Keokuk for CY 2011 was \$26,279,652 as determined by the locational marginal pricing through the MISO.

The RECs generated from the Keokuk facility are on Ameren Missouri's books at zero cost and value. There are two reasons for this. First, due to the restrictive nature of utilizing hydroelectric to meet Renewable Portfolio Standards (RPS) in other states, there is a very limited market in which the associated Keokuk RECs could be utilized outside of Missouri. Second, the RECs created by this generation are an added benefit to Ameren Missouri rate payers as the capital and operational costs associated with Keokuk are already a part of the existing rate structure. Since the company has not incurred any additional costs above or beyond in order to acquire these RECs, the benefit to the rate payers is in the ability of Ameren Missouri to utilize these RECs to meet compliance and not incur any additional cost in the process.

In December, 2010 Ameren Missouri completed construction of approximately 100 kW of various PV solar technologies at its headquarters office building.

The Ameren Missouri headquarters solar installation was certified as a qualified renewable generation facility by the MoDNR on September 28, 2011. The total generational output of this facility during CY 2011 was 113 MWhs. In accordance with RSMo 393.1030, and as this facility is located in the state of Missouri, a factor of 1.25 is applied to the generation from this facility such that the generation counts as 141 MWhs towards the compliance requirements.

The full generational output of this solar facility is consumed at the company's headquarters building. This represents approximately 0.4% of the total electric consumption at the building.

There is no assigned value of the electricity generated as Ameren does not bill itself for generational requirements.

The value of the S-RECs could be stated as between ■■■ \$100 which represents the cost of the S-RECs procured from both 3rd party brokers in the national market and the price paid to Ameren Missouri customers.

However, assigning such a value has no bearing on the cost implications related to compliance with the MoRES. There is no reason to assign a notational value since the cost of capital and O&M associated with the generation from this facility represents the cost of compliance with the MoRES and only those values will be utilized to determine the impact against the 1% rate cap limitation.

Ameren Missouri will use all generation from this solar installation to meet current and future MoRES compliance requirements.

Section (7) (A) 1 E

RECs Acquired and Retired

During CY 2011, Ameren Missouri purchased energy including the associated RECs from the Pioneer Prairie Wind Farm. A total of 288,483 RECs were acquired in CY 2011 under the terms of the 15 year power purchase agreement.

In late 2010, Ameren Missouri purchased 12,606 solar RECs from various third party brokers. During CY 2011, an additional 17,400 solar RECs (includes 4,000 S-RECs to be delivered by 12/31/12) were purchased from various third party brokers. These S-RECs are associated with qualified solar facilities and registered with the Western Renewable Energy Generation Information System (WREGIS).

In CY 2011, Ameren Missouri established the Standard Offer Contract whereby customers who install solar generation sized less than 100 kW are eligible to sell the S-RECs created by their systems to Ameren Missouri for \$100 per REC.

There are two contract types: For systems sized less than 10 kW, Ameren Missouri utilizes a program established by the U.S. DOE called PV Watts to determine the annual generational output from systems installed in the region. Customers who have these size systems are paid a lump-sum up-front payment equal to the generation from their system for a 10 year period. Those RECs are then used over the 10 year period to meet the solar compliance requirement. For systems greater than 10 kW, a five year contract is used but an additional meter is required and customers are paid based on actual production.

Funding for the program was limited to \$2.0 million and was fully subscribed such that over the 10 year period, Ameren Missouri should receive approximately 20,000 S-RECs from its customers.

During CY 2011, Ameren Missouri acquired 1,060 solar RECs from its customers under terms of the Standard Offer Contract based on the PV Watts calculation and the start-up time for the systems. Of this amount, 680 RECs came from systems less than 10 kW in size and 380 were associated with systems greater than 10 kW in size. The S-RECs procured from customers with systems greater than 10 kW are metered separately and not paid for until the following year.

The S-RECs acquired from customers will also be eligible for the 1.25 factor application as stipulated in RSMo 393.1030.

Ameren Missouri retired a total of 733,598 Keokuk RECs to meet the non-solar requirements and retired a total of 14,971 S-RECs that were acquired from various third party brokers to meet the solar requirements for CY 2011.

Section (7) (A) 1 F

Source of RECs Acquired

See Sections (A) 1 D and E above

Section (7) (A) 1 G

RECs Carried Forward

RECs being carried forward through the 3 year banking provision are as follows:

<u>Facility</u>	<u>RECs</u>	<u>S-RECs</u>
Keokuk	2,790,608	
Pioneer Prairie	671,202	
WREGIS Accts.		11,035*
Ameren Customers		1,060**
Headquarters generation		113**

*An additional 4,000 S-RECs were contracted for in CY 2011 but are 2012 vintage and will not be delivered until the end of CY 2012.

** For Ameren customer generation, this number represents only those S-RECs actually attributed to 2011 production. This value does not include the in-state factor of 1.25.

See Exhibit 1 for details

Section (7) (A) 1 H

Gains or Losses from Purchases or Sales

Not applicable. There were no sales of RECs and all procurement was either utilized to meet CY 2011 requirements or has been banked in Ameren Missouri's NAR account and will be used for future compliance requirements.

Section (7) (A) 1 I

RECs from Non-Utility Owned Resources

Non-solar

Facility Owner:	EDP Renewables
Facility Name:	Pioneer Prairie Wind Farm I
Resource Type:	Wind
Location:	Mitchell County, Iowa Wayne and Stacyville Townships
Turbines:	Vestas V82 1.65 MW per turbine

See Exhibit 2 for Affidavit

See Exhibit 3 for Meter Reads and Payments

Solar

Ameren Missouri was granted a waiver by the Missouri Public Service Commission on January 11, 2012; File No. EO-2012-0150 for all reporting requirements associated with S-RECs purchased by Ameren Missouri from the various brokers and from its utility customers who have installed small scale solar generation facilities at their homes and businesses.

Section (7) (A) 1 J

Customer Solar Rebates

During CY 2011, Ameren Missouri processed and paid 226 requests for solar rebates. No rebates are processed until all required meter work has been performed.

Section (7) (A) 1 K

Customer Denied Rebates

There was one customer rebate denial due to installation of used equipment moved from a previous residence. In accordance with 4 CSR 240-20.100 (4) (D), to be eligible for the solar rebate, all equipment must be new.

Section (7) (A) 1 L

Funds Expended for Solar Rebates

During CY 2011, Ameren Missouri paid out \$2,964,306 associated with solar rebates.

See Exhibit 4 for Solar Rebate Tariff details

S-REC Contract Terms and Conditions

Ameren Missouri made available a Standard Offer Contract to purchase the S-RECs from customers who installed less than 100 kW of solar at their homes and/or businesses and met all net metering requirements as applicable under tariffs filed by Ameren Missouri and approved by the MoPSC.

There were two basic contract offers:

- (1) Systems less than 10 kW and (2) systems from 10kW up to 100 kW

All RECs were purchased at the rate of \$100 per MWh.

For systems less than 10 kW, no additional metering was required; however existing meters were replaced with bi-directional meters. Ameren Missouri utilized calculations from PV Watts to determine the amount of generation expected to occur in the Ameren Missouri service territory based on the DC wattage of the installation. Ameren Missouri would then make an up-front payment of \$100 per REC based on the full estimated output of the system for a 10 year period.

For systems of 10 kW and greater, a second meter was required. All generation is metered and customers are paid \$100 per S-REC based on the actual generation from their system. These payments are made by March 31 of the following year. Contracts are for a term of 5 years.

See Exhibit 5 for SREC Purchase Tariff

Section (7) (A) 1 M

Utility Compliance with RES Plan

See Exhibit 6 for company Affidavit

Exhibit 1 Keokuk RECs

Sub-Account	Sub-Account	NAR ID	Asset	Fuel/Project	Certificate	Certificate Serial Numbers	Quantity
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	9-Jan	NAR-REC-160-A-01-2009-1144-1 to 72887	72887
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	9-Feb	NAR-REC-160-A-02-2009-1145-1 to 70007	70007
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	9-Mar	NAR-REC-160-A-03-2009-1146-1 to 69780	69780
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	9-Apr	NAR-REC-160-A-04-2009-1147-1 to 72492	72492
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	9-May	NAR-REC-160-A-05-2009-1148-1 to 70469	70469
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	9-Jun	NAR-REC-160-A-06-2009-1149-1 to 76332	76332
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	9-Jul	NAR-REC-160-A-07-2009-1150-1 to 94140	94140
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	9-Aug	NAR-REC-160-A-08-2009-1151-1 to 90136	90136
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	9-Sep	NAR-REC-160-A-09-2009-1152-1 to 70715	70715
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	9-Oct	NAR-REC-160-A-10-2009-1153-1 to 87071	87071
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	9-Nov	NAR-REC-160-A-11-2009-1154-1 to 88133	88133
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	9-Dec	NAR-REC-160-A-12-2009-1155-1 to 87747	87747
							949909
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	10-Jan	NAR-REC-160-A-01-2010-1121-1 to 88773	88773
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	10-Feb	NAR-REC-160-A-02-2010-1122-1 to 83114	83114
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	10-Mar	NAR-REC-160-A-03-2010-1123-1 to 66155	66155
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	10-Apr	NAR-REC-160-A-04-2010-1124-1 to 72349	72349
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	10-May	NAR-REC-160-A-05-2010-1125-1 to 81708	81708
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	10-Jun	NAR-REC-160-A-06-2010-1126-1 to 70991	70991
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	10-Jul	NAR-REC-160-A-07-2010-1127-1 to 60407	60407
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	10-Aug	NAR-REC-160-A-08-2010-1128-1 to 66032	66032
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	10-Sep	NAR-REC-160-A-09-2010-1129-1 to 87254	87254
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	10-Oct	NAR-REC-160-A-10-2010-1130-1 to 77912	77912
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	10-Nov	NAR-REC-160-A-11-2010-1131-1 to 89428	89428
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	10-Dec	NAR-REC-160-A-12-2010-1132-1 to 86128	86128
							930246
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	11-Jan	NAR-REC-160-A-01-2011-1396-1 to 98450	98450
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	11-Feb	NAR-REC-160-A-02-2011-1403-1 to 71752	71752
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	11-Mar	NAR-REC-160-A-03-2011-1449-1 to 87479	87479
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	11-Apr	NAR-REC-160-A-04-2011-1456-1 to 55409	55409
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	11-May	NAR-REC-160-A-05-2011-1463-1 to 67493	67493
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	11-Jun	NAR-REC-160-A-06-2011-1748-1 to 66618	66618
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	11-Jul	NAR-REC-160-A-07-2011-1843-1 to 84874	84874
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	11-Aug	NAR-REC-160-A-08-2011-2393-1 to 98905	98905
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	11-Sep	NAR-REC-160-A-09-2011-2431-1 to 72804	72804
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	11-Oct	NAR-REC-160-A-10-2011-2498-1 to 64345	64345
Keokuk	273	GEN160	Keokuk - Keokuk	Hydroelect	11-Nov	NAR-REC-160-A-11-2011-3207-1 to 73785	73785
Keokuk					11-Dec	Estimate for December, 2011	78,536
Total							910448
Grand Total							2790608

**Exhibit 1
Pioneer Prairie RECs**

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CONFIDENTIAL IN
ITS ENTIRETY**

Exhibit 1

Solar RECs from WREGIS Accounts

Sub-Account	Sub-Account ID	NAR ID	Fuel/Project Certificate	Certificate Serial Numbers	Quantity
Solar RECs	266	IMP118	Solar	11-Jan IMP-WREGIS-REC-118-CA-10-2010-1518-1 to 3	3
Solar RECs	266	IMP118	Solar	11-Jan IMP-WREGIS-REC-118-CA-11-2010-1564-1 to 3	3
Solar RECs	266	IMP118	Solar	11-Jan IMP-WREGIS-REC-118-CA-12-2010-1612-1 to 3	3
Solar RECs	266	IMP118	Solar	11-Jan IMP-WREGIS-REC-118-CA-01-2011-1650-1 to 4	4
Solar RECs	266	IMP118	Solar	11-Jan IMP-WREGIS-REC-118-CA-02-2011-1674-1 to 4	4
Solar RECs	266	IMP118	Solar	11-Jan IMP-WREGIS-REC-118-CA-03-2011-1697-1 to 5	5
Solar RECs	266	IMP119	Solar	11-Jan IMP-WREGIS-REC-119-CA-03-2011-1698-1 to 5	5
Solar RECs	266	IMP119	Solar	11-Jan IMP-WREGIS-REC-119-CA-02-2011-1675-1 to 4	4
Solar RECs	266	IMP119	Solar	11-Jan IMP-WREGIS-REC-119-CA-01-2011-1651-1 to 3	3
Solar RECs	266	IMP119	Solar	11-Jan IMP-WREGIS-REC-119-CA-12-2010-1613-1 to 3	3
Solar RECs	266	IMP119	Solar	11-Jan IMP-WREGIS-REC-119-CA-11-2010-1565-1 to 3	3
Solar RECs	266	IMP119	Solar	11-Jan IMP-WREGIS-REC-119-CA-10-2010-1519-1 to 3	3
Solar RECs	266	IMP123	Solar	11-Jan IMP-WREGIS-REC-123-CA-12-2010-1617-1 to 3	3
Solar RECs	266	IMP123	Solar	11-Jan IMP-WREGIS-REC-123-CA-11-2010-1569-1 to 4	4
Solar RECs	266	IMP123	Solar	11-Jan IMP-WREGIS-REC-123-CA-01-2011-1655-1 to 4	4
Solar RECs	266	IMP123	Solar	11-Jan IMP-WREGIS-REC-123-CA-02-2011-1679-1 to 4	4
Solar RECs	266	IMP123	Solar	11-Jan IMP-WREGIS-REC-123-CA-03-2011-1702-1 to 5	5
Solar RECs	266	IMP120	Solar	11-Jan IMP-WREGIS-REC-120-CA-03-2011-1699-1 to 4	4
Solar RECs	266	IMP120	Solar	11-Jan IMP-WREGIS-REC-120-CA-01-2011-1652-1 to 4	4
Solar RECs	266	IMP120	Solar	11-Jan IMP-WREGIS-REC-120-CA-02-2011-1676-1 to 4	4
Solar RECs	266	IMP120	Solar	11-Jan IMP-WREGIS-REC-120-CA-12-2010-1614-1 to 2	2
Solar RECs	266	IMP120	Solar	11-Jan IMP-WREGIS-REC-120-CA-11-2010-1566-1 to 4	4
Solar RECs	266	IMP121	Solar	11-Jan IMP-WREGIS-REC-121-CA-11-2010-1567-1 to 7	7
Solar RECs	266	IMP121	Solar	11-Jan IMP-WREGIS-REC-121-CA-12-2010-1615-1 to 4	4
Solar RECs	266	IMP121	Solar	11-Jan IMP-WREGIS-REC-121-CA-02-2011-1677-1 to 7	7
Solar RECs	266	IMP121	Solar	11-Jan IMP-WREGIS-REC-121-CA-01-2011-1653-1 to 6	6
Solar RECs	266	IMP121	Solar	11-Jan IMP-WREGIS-REC-121-CA-03-2011-1700-1 to 7	7
Solar RECs	266	IMP122	Solar	11-Jan IMP-WREGIS-REC-122-CA-03-2011-1701-1 to 7	7
Solar RECs	266	IMP122	Solar	11-Jan IMP-WREGIS-REC-122-CA-02-2011-1678-1 to 5	5
Solar RECs	266	IMP122	Solar	11-Jan IMP-WREGIS-REC-122-CA-01-2011-1654-1 to 6	6
Solar RECs	266	IMP122	Solar	11-Jan IMP-WREGIS-REC-122-CA-12-2010-1616-1 to 4	4
Solar RECs	266	IMP122	Solar	11-Jan IMP-WREGIS-REC-122-CA-11-2010-1568-1 to 6	6
Solar RECs	266	IMP124	Solar	11-Jan IMP-WREGIS-REC-124-CA-01-2011-2660-1 to 7	7

Exhibit 1 **Solar RECs from WREGIS Accounts**

Solar RECs	266 IMP124	Solar	11-Jan IMP-WREG IS-REC-124-CA-02-2011-2661-1 to 10	10
Solar RECs	266 IMP124	Solar	11-Jan IMP-WREG IS-REC-124-CA-03-2011-2543-1 to 12	12
Solar RECs	266 IMP124	Solar	11-Jan IMP-WREG IS-REC-124-CA-04-2011-2688-1 to 19	19
Solar RECs	266 IMP124	Solar	11-Jan IMP-WREG IS-REC-124-CA-06-2011-2565-1 to 21	21
Solar RECs	266 IMP267	Solar	11-Jan IMP-WREG IS-REC-267-CA-05-2011-2477-1 to 194	194
Solar RECs	266 IMP267	Solar	11-Jan IMP-WREG IS-REC-267-CA-04-2011-2465-1 to 157	157
Solar RECs	266 IMP100	Solar	11-Jan IMP-WREG IS-REC-100-CA-12-2010-1598-56 to 106	51
Solar RECs	266 IMP100	Solar	11-Jan IMP-WREG IS-REC-100-CA-11-2010-1551-1 to 115	115
Solar RECs	266 IMP100	Solar	11-Jan IMP-WREG IS-REC-100-CA-05-2011-2507-1 to 122	122
Solar RECs	266 IMP100	Solar	11-Jan IMP-WREG IS-REC-100-CA-04-2011-2646-1 to 210	210
Solar RECs	266 IMP100	Solar	11-Jan IMP-WREG IS-REC-100-CA-05-2011-2647-1 to 12	12
Solar RECs	266 IMP100	Solar	11-Jan IMP-WREG IS-REC-100-CA-07-2011-2707-1 to 303	303
Solar RECs	266 IMP125	Solar	11-Jan IMP-WREG IS-REC-125-CA-06-2011-2567-1 to 15	15
Solar RECs	266 IMP125	Solar	11-Jan IMP-WREG IS-REC-125-CA-04-2011-2689-1 to 13	13
Solar RECs	266 IMP125	Solar	11-Jan IMP-WREG IS-REC-125-CA-05-2011-2566-1 to 15	15
Solar RECs	266 IMP125	Solar	11-Jan IMP-WREG IS-REC-125-CA-01-2011-2533-1 to 1	1
Solar RECs	266 IMP125	Solar	11-Jan IMP-WREG IS-REC-125-CA-03-2011-2544-1 to 9	9
Solar RECs	266 IMP125	Solar	11-Jan IMP-WREG IS-REC-125-CA-02-2011-2663-1 to 7	7
Solar RECs	266 IMP125	Solar	11-Jan IMP-WREG IS-REC-125-CA-01-2011-2662-1 to 5	5
Solar RECs	266 IMP126	Solar	11-Jan IMP-WREG IS-REC-126-CA-02-2011-2665-1 to 29	29
Solar RECs	266 IMP126	Solar	11-Jan IMP-WREG IS-REC-126-CA-03-2011-2545-1 to 34	34
Solar RECs	266 IMP126	Solar	11-Jan IMP-WREG IS-REC-126-CA-01-2011-2534-1 to 5	5
Solar RECs	266 IMP126	Solar	11-Jan IMP-WREG IS-REC-126-CA-01-2011-2664-1 to 17	17
Solar RECs	266 IMP126	Solar	11-Jan IMP-WREG IS-REC-126-CA-05-2011-2568-1 to 60	60
Solar RECs	266 IMP126	Solar	11-Jan IMP-WREG IS-REC-126-CA-04-2011-2690-1 to 55	55
Solar RECs	266 IMP126	Solar	11-Jan IMP-WREG IS-REC-126-CA-06-2011-2569-1 to 62	62
Solar RECs	266 IMP101	Solar	11-Jan IMP-WREG IS-REC-101-CA-11-2010-1552-1 to 105	105
Solar RECs	266 IMP101	Solar	11-Jan IMP-WREG IS-REC-101-CA-12-2010-1599-1 to 75	75
Solar RECs	266 IMP101	Solar	11-Jan IMP-WREG IS-REC-101-CA-01-2011-2602-1 to 95	95
Solar RECs	266 IMP101	Solar	11-Jan IMP-WREG IS-REC-101-CA-03-2011-2511-15 to 129	115
Solar RECs	266 IMP101	Solar	11-Jan IMP-WREG IS-REC-101-CA-02-2011-2654-1 to 104	104
Solar RECs	266 IMP102	Solar	11-Feb IMP-WREG IS-REC-102-CA-01-2011-1646-1 to 4	4
Solar RECs	266 IMP102	Solar	11-Feb IMP-WREG IS-REC-102-CA-02-2011-1673-1 to 12	12
Solar RECs	266 IMP102	Solar	11-Feb IMP-WREG IS-REC-102-CA-12-2010-1600-1 to 9	9

Exhibit 1 **Solar RECs from WREGIS Accounts**

Solar RECs	266	IMP102	Solar	11-Feb IMP-WREG IS-REC-102-CA-11-2010-1553-1 to 17	17
Solar RECs	266	IMP102	Solar	11-Feb IMP-WREG IS-REC-102-CA-03-2011-2512-5 to 25	21
Solar RECs	266	IMP128	Solar	11-Feb IMP-WREG IS-REC-128-CA-03-2011-2546-1 to 19	19
Solar RECs	266	IMP128	Solar	11-Feb IMP-WREG IS-REC-128-CA-02-2011-2667-1 to 17	17
Solar RECs	266	IMP128	Solar	11-Feb IMP-WREG IS-REC-128-CA-01-2011-2666-1 to 10	10
Solar RECs	266	IMP128	Solar	11-Feb IMP-WREG IS-REC-128-CA-01-2011-2535-1 to 3	3
Solar RECs	266	IMP128	Solar	11-Feb IMP-WREG IS-REC-128-CA-06-2011-2571-1 to 34	34
Solar RECs	266	IMP128	Solar	11-Feb IMP-WREG IS-REC-128-CA-04-2011-2691-1 to 30	30
Solar RECs	266	IMP128	Solar	11-Feb IMP-WREG IS-REC-128-CA-05-2011-2570-1 to 32	32
Solar RECs	266	IMP103	Solar	11-Feb IMP-WREG IS-REC-103-CA-05-2011-2510-1 to 311	311
Solar RECs	266	IMP103	Solar	11-Feb IMP-WREG IS-REC-103-CA-06-2011-2509-1 to 302	302
Solar RECs	266	IMP103	Solar	11-Feb IMP-WREG IS-REC-103-CA-07-2011-2593-1 to 273	273
Solar RECs	266	IMP103	Solar	11-Feb IMP-WREG IS-REC-103-CA-08-2011-2519-160 to 408	249
Solar RECs	266	IMP103	Solar	11-Feb IMP-WREG IS-REC-103-CA-11-2010-1554-1 to 163	163
Solar RECs	266	IMP103	Solar	11-Feb IMP-WREG IS-REC-103-CA-12-2010-1601-1 to 115	115
Solar RECs	266	IMP103	Solar	11-Feb IMP-WREG IS-REC-103-CA-04-2011-2508-1 to 265	265
Solar RECs	266	IMP256	Solar	11-Feb IMP-WREG IS-REC-256-CA-08-2011-2527-89 to 284	196
Solar RECs	266	IMP256	Solar	11-Feb IMP-WREG IS-REC-256-CA-07-2011-2601-1 to 200	200
Solar RECs	266	IMP129	Solar	11-Feb IMP-WREG IS-REC-129-CA-06-2011-2573-1 to 20	20
Solar RECs	266	IMP129	Solar	11-Feb IMP-WREG IS-REC-129-CA-05-2011-2572-1 to 20	20
Solar RECs	266	IMP129	Solar	11-Feb IMP-WREG IS-REC-129-CA-04-2011-2692-1 to 18	18
Solar RECs	266	IMP129	Solar	11-Feb IMP-WREG IS-REC-129-CA-03-2011-2547-1 to 11	11
Solar RECs	266	IMP129	Solar	11-Feb IMP-WREG IS-REC-129-CA-02-2011-2669-1 to 10	10
Solar RECs	266	IMP129	Solar	11-Feb IMP-WREG IS-REC-129-CA-01-2011-2536-1 to 1	1
Solar RECs	266	IMP129	Solar	11-Feb IMP-WREG IS-REC-129-CA-01-2011-2668-1 to 7	7
Solar RECs	266	IMP130	Solar	11-Feb IMP-WREG IS-REC-130-CA-12-2010-1618-1 to 3	3
Solar RECs	266	IMP130	Solar	11-Feb IMP-WREG IS-REC-130-CA-11-2010-1570-1 to 6	6
Solar RECs	266	IMP130	Solar	11-Feb IMP-WREG IS-REC-130-CA-01-2011-1656-1 to 6	6
Solar RECs	266	IMP130	Solar	11-Feb IMP-WREG IS-REC-130-CA-02-2011-1680-1 to 6	6
Solar RECs	266	IMP130	Solar	11-Feb IMP-WREG IS-REC-130-CA-03-2011-1703-1 to 6	6
Solar RECs	266	IMP131	Solar	11-Feb IMP-WREG IS-REC-131-CA-03-2011-1704-1 to 11	11
Solar RECs	266	IMP131	Solar	11-Feb IMP-WREG IS-REC-131-CA-02-2011-1681-1 to 8	8
Solar RECs	266	IMP131	Solar	11-Feb IMP-WREG IS-REC-131-CA-01-2011-1657-1 to 7	7
Solar RECs	266	IMP131	Solar	11-Feb IMP-WREG IS-REC-131-CA-11-2010-1571-1 to 8	8

Exhibit 1 **Solar REC's from WREGIS Accounts**

Solar REC's	266 IMP131	Solar	11-Feb IMP-WREGIS-REC-131-CA-12-2010-1619-1 to 6	6
Solar REC's	266 IMP132	Solar	11-Feb IMP-WREGIS-REC-132-CA-01-2011-2670-1 to 6	6
Solar REC's	266 IMP132	Solar	11-Feb IMP-WREGIS-REC-132-CA-01-2011-2537-1 to 1	1
Solar REC's	266 IMP132	Solar	11-Feb IMP-WREGIS-REC-132-CA-02-2011-2671-1 to 10	10
Solar REC's	266 IMP132	Solar	11-Feb IMP-WREGIS-REC-132-CA-03-2011-2548-1 to 12	12
Solar REC's	266 IMP132	Solar	11-Feb IMP-WREGIS-REC-132-CA-04-2011-2693-1 to 19	19
Solar REC's	266 IMP132	Solar	11-Feb IMP-WREGIS-REC-132-CA-05-2011-2574-1 to 20	20
Solar REC's	266 IMP132	Solar	11-Feb IMP-WREGIS-REC-132-CA-06-2011-2575-1 to 22	22
Solar REC's	266 IMP133	Solar	11-Feb IMP-WREGIS-REC-133-CA-06-2011-2577-1 to 14	14
Solar REC's	266 IMP133	Solar	11-Feb IMP-WREGIS-REC-133-CA-05-2011-2576-1 to 13	13
Solar REC's	266 IMP133	Solar	11-Feb IMP-WREGIS-REC-133-CA-04-2011-2694-1 to 12	12
Solar REC's	266 IMP133	Solar	11-Feb IMP-WREGIS-REC-133-CA-03-2011-2549-1 to 8	8
Solar REC's	266 IMP133	Solar	11-Feb IMP-WREGIS-REC-133-CA-02-2011-2673-1 to 7	7
Solar REC's	266 IMP133	Solar	11-Feb IMP-WREGIS-REC-133-CA-01-2011-2672-1 to 5	5
Solar REC's	266 IMP104	Solar	11-Feb IMP-WREGIS-REC-104-CA-04-2011-2612-1 to 40	40
Solar REC's	266 IMP104	Solar	11-Mar IMP-WREGIS-REC-104-CA-05-2011-2613-1 to 43	43
Solar REC's	266 IMP104	Solar	11-Mar IMP-WREGIS-REC-104-CA-06-2011-2558-1 to 39	39
Solar REC's	266 IMP105	Solar	11-Mar IMP-WREGIS-REC-105-CA-05-2011-2623-1 to 40	40
Solar REC's	266 IMP105	Solar	11-Mar IMP-WREGIS-REC-105-CA-06-2011-2564-1 to 41	41
Solar REC's	266 IMP161	Solar	11-Mar IMP-WREGIS-REC-161-CA-05-2011-2631-1 to 45	45
Solar REC's	266 IMP161	Solar	11-Mar IMP-WREGIS-REC-161-CA-06-2011-2609-1 to 40	40
Solar REC's	266 IMP161	Solar	11-Mar IMP-WREGIS-REC-161-CA-04-2011-2630-1 to 42	42
Solar REC's	266 IMP106	Solar	11-Mar IMP-WREGIS-REC-106-CA-05-2011-2618-1 to 28	28
Solar REC's	266 IMP106	Solar	11-Mar IMP-WREGIS-REC-106-CA-06-2011-2561-1 to 27	27
Solar REC's	266 IMP106	Solar	11-Mar IMP-WREGIS-REC-106-CA-04-2011-2617-1 to 24	24
Solar REC's	266 IMP107	Solar	11-Mar IMP-WREGIS-REC-107-CA-12-2010-1602-1 to 31	31
Solar REC's	266 IMP107	Solar	11-Mar IMP-WREGIS-REC-107-CA-11-2010-1555-1 to 46	46
Solar REC's	266 IMP107	Solar	11-Mar IMP-WREGIS-REC-107-CA-10-2010-1508-22 to 36	15
Solar REC's	266 IMP107	Solar	11-Mar IMP-WREGIS-REC-107-CA-04-2011-2621-1 to 62	62
Solar REC's	266 IMP107	Solar	11-Mar IMP-WREGIS-REC-107-CA-06-2011-2563-1 to 62	62
Solar REC's	266 IMP107	Solar	11-Mar IMP-WREGIS-REC-107-CA-05-2011-2622-1 to 70	70
Solar REC's	266 IMP108	Solar	11-Mar IMP-WREGIS-REC-108-CA-10-2010-1509-1 to 23	23
Solar REC's	266 IMP108	Solar	11-Mar IMP-WREGIS-REC-108-CA-11-2010-1556-1 to 26	26
Solar REC's	266 IMP108	Solar	11-Mar IMP-WREGIS-REC-108-CA-12-2010-1603-1 to 17	17

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Solar RECs from WREGIS Accounts

Solar RECs	266 IMP108	Solar	11-Mar IMP-WREGIS-REC-108-CA-06-2011-2559-1 to 35	35
Solar RECs	266 IMP108	Solar	11-Mar IMP-WREGIS-REC-108-CA-05-2011-2614-1 to 40	40
Solar RECs	266 IMP109	Solar	11-Mar IMP-WREGIS-REC-109-CA-11-2010-1557-1 to 44	44
Solar RECs	266 IMP109	Solar	11-Mar IMP-WREGIS-REC-109-CA-10-2010-1510-1 to 43	43
Solar RECs	266 IMP109	Solar	11-Mar IMP-WREGIS-REC-109-CA-12-2010-1604-1 to 30	30
Solar RECs	266 IMP109	Solar	11-Mar IMP-WREGIS-REC-109-CA-04-2011-2619-1 to 60	60
Solar RECs	266 IMP109	Solar	11-Mar IMP-WREGIS-REC-109-CA-05-2011-2620-1 to 67	67
Solar RECs	266 IMP109	Solar	11-Mar IMP-WREGIS-REC-109-CA-06-2011-2562-1 to 66	66
Solar RECs	266 IMP162	Solar	11-Mar IMP-WREGIS-REC-162-CA-05-2011-2616-1 to 23	23
Solar RECs	266 IMP162	Solar	11-Mar IMP-WREGIS-REC-162-CA-06-2011-2560-1 to 20	20
Solar RECs	266 IMP162	Solar	11-Mar IMP-WREGIS-REC-162-CA-04-2011-2615-1 to 21	21
Solar RECs	266 IMP110	Solar	11-Mar IMP-WREGIS-REC-110-CA-05-2011-2611-1 to 63	63
Solar RECs	266 IMP110	Solar	11-Mar IMP-WREGIS-REC-110-CA-06-2011-2557-1 to 64	64
Solar RECs	266 IMP111	Solar	11-Mar IMP-WREGIS-REC-111-CA-12-2010-1605-1 to 8	8
Solar RECs	266 IMP111	Solar	11-Mar IMP-WREGIS-REC-111-CA-10-2010-1511-1 to 17	17
Solar RECs	266 IMP111	Solar	11-Mar IMP-WREGIS-REC-111-CA-11-2010-1558-1 to 15	15
Solar RECs	266 IMP111	Solar	11-Mar IMP-WREGIS-REC-111-CA-06-2011-2524-1 to 26	26
Solar RECs	266 IMP112	Solar	11-Mar IMP-WREGIS-REC-112-CA-10-2010-1512-1 to 47	47
Solar RECs	266 IMP112	Solar	11-Mar IMP-WREGIS-REC-112-CA-12-2010-1606-1 to 20	20
Solar RECs	266 IMP112	Solar	11-Mar IMP-WREGIS-REC-112-CA-05-2011-2711-1 to 67	67
Solar RECs	266 IMP112	Solar	11-Mar IMP-WREGIS-REC-112-CA-04-2011-2710-1 to 62	62
Solar RECs	266 IMP112	Solar	11-Mar IMP-WREGIS-REC-112-CA-07-2011-2598-1 to 67	67
Solar RECs	266 IMP112	Solar	11-Mar IMP-WREGIS-REC-112-CA-06-2011-2608-1 to 64	64
Solar RECs	266 IMP112	Solar	11-Mar IMP-WREGIS-REC-112-CA-08-2011-2523-1 to 64	64
Solar RECs	266 IMP134	Solar	11-Mar IMP-WREGIS-REC-134-CA-12-2010-1620-1 to 3	3
Solar RECs	266 IMP134	Solar	11-Mar IMP-WREGIS-REC-134-CA-11-2010-1572-1 to 4	4
Solar RECs	266 IMP134	Solar	11-Mar IMP-WREGIS-REC-134-CA-10-2010-1526-1 to 4	4
Solar RECs	266 IMP134	Solar	11-Mar IMP-WREGIS-REC-134-CA-02-2011-1682-1 to 4	4
Solar RECs	266 IMP134	Solar	11-Mar IMP-WREGIS-REC-134-CA-03-2011-1705-1 to 5	5
Solar RECs	266 IMP134	Solar	11-Mar IMP-WREGIS-REC-134-CA-01-2011-1658-1 to 4	4
Solar RECs	266 IMP135	Solar	11-Mar IMP-WREGIS-REC-135-CA-02-2011-2675-1 to 10	10
Solar RECs	266 IMP135	Solar	11-Mar IMP-WREGIS-REC-135-CA-03-2011-2550-1 to 13	13
Solar RECs	266 IMP135	Solar	11-Mar IMP-WREGIS-REC-135-CA-01-2011-2674-1 to 7	7
Solar RECs	266 IMP135	Solar	11-Mar IMP-WREGIS-REC-135-CA-01-2011-2538-1 to 1	1

Exhibit 1 **Solar RECs from WREGIS Accounts**

Solar RECs	266 IMP135	Solar	11-Mar IMP-WREGIS-REC-135-CA-06-2011-2579-1 to 23	23
Solar RECs	266 IMP135	Solar	11-Apr IMP-WREGIS-REC-135-CA-04-2011-2695-1 to 20	20
Solar RECs	266 IMP135	Solar	11-Apr IMP-WREGIS-REC-135-CA-05-2011-2578-1 to 22	22
Solar RECs	266 IMP136	Solar	11-Apr IMP-WREGIS-REC-136-CA-05-2011-2580-1 to 3	3
Solar RECs	266 IMP136	Solar	11-Apr IMP-WREGIS-REC-136-CA-06-2011-2581-1 to 108	108
Solar RECs	266 IMP136	Solar	11-Apr IMP-WREGIS-REC-136-CA-01-2011-2676-1 to 33	33
Solar RECs	266 IMP136	Solar	11-Apr IMP-WREGIS-REC-136-CA-03-2011-2551-1 to 62	62
Solar RECs	266 IMP136	Solar	11-Apr IMP-WREGIS-REC-136-CA-04-2011-2696-1 to 97	97
Solar RECs	266 IMP136	Solar	11-Apr IMP-WREGIS-REC-136-CA-02-2011-2677-1 to 54	54
Solar RECs	266 IMP136	Solar	11-Apr IMP-WREGIS-REC-136-CA-01-2011-2539-1 to 9	9
Solar RECs	266 IMP113	Solar	11-Apr IMP-WREGIS-REC-113-CA-01-2011-1647-1 to 12	12
Solar RECs	266 IMP113	Solar	11-Apr IMP-WREGIS-REC-113-CA-12-2010-1607-1 to 10	10
Solar RECs	266 IMP113	Solar	11-Apr IMP-WREGIS-REC-113-CA-10-2010-1513-1 to 13	13
Solar RECs	266 IMP113	Solar	11-Apr IMP-WREGIS-REC-113-CA-11-2010-1559-1 to 14	14
Solar RECs	266 IMP113	Solar	11-Apr IMP-WREGIS-REC-113-CA-02-2011-2655-1 to 16	16
Solar RECs	266 IMP113	Solar	11-Apr IMP-WREGIS-REC-113-CA-03-2011-2513-1 to 22	22
Solar RECs	266 IMP137	Solar	11-Apr IMP-WREGIS-REC-137-CA-04-2011-2697-1 to 14	14
Solar RECs	266 IMP137	Solar	11-Apr IMP-WREGIS-REC-137-CA-03-2011-2552-1 to 9	9
Solar RECs	266 IMP137	Solar	11-Apr IMP-WREGIS-REC-137-CA-02-2011-2679-1 to 8	8
Solar RECs	266 IMP137	Solar	11-Apr IMP-WREGIS-REC-137-CA-01-2011-2540-1 to 1	1
Solar RECs	266 IMP137	Solar	11-Apr IMP-WREGIS-REC-137-CA-01-2011-2678-1 to 6	6
Solar RECs	266 IMP137	Solar	11-Apr IMP-WREGIS-REC-137-CA-06-2011-2583-1 to 16	16
Solar RECs	266 IMP137	Solar	11-Apr IMP-WREGIS-REC-137-CA-05-2011-2582-1 to 16	16
Solar RECs	266 IMP138	Solar	11-Apr IMP-WREGIS-REC-138-CA-05-2011-2584-1 to 27	27
Solar RECs	266 IMP138	Solar	11-Apr IMP-WREGIS-REC-138-CA-06-2011-2585-1 to 29	29
Solar RECs	266 IMP138	Solar	11-Apr IMP-WREGIS-REC-138-CA-01-2011-2680-1 to 8	8
Solar RECs	266 IMP138	Solar	11-Apr IMP-WREGIS-REC-138-CA-01-2011-2541-1 to 2	2
Solar RECs	266 IMP138	Solar	11-Apr IMP-WREGIS-REC-138-CA-02-2011-2681-1 to 13	13
Solar RECs	266 IMP138	Solar	11-Apr IMP-WREGIS-REC-138-CA-04-2011-2698-1 to 25	25
Solar RECs	266 IMP138	Solar	11-Apr IMP-WREGIS-REC-138-CA-03-2011-2553-1 to 15	15
Solar RECs	266 IMP140	Solar	11-Apr IMP-WREGIS-REC-140-CA-03-2011-2554-1 to 10	10
Solar RECs	266 IMP140	Solar	11-Apr IMP-WREGIS-REC-140-CA-04-2011-2699-1 to 15	15
Solar RECs	266 IMP140	Solar	11-Apr IMP-WREGIS-REC-140-CA-02-2011-2683-1 to 8	8
Solar RECs	266 IMP140	Solar	11-Apr IMP-WREGIS-REC-140-CA-01-2011-2682-1 to 6	6

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Solar RECs from WREGIS Accounts

Solar RECs	266 IMP140	Solar	11-Apr IMP-WREGIS-REC-140-CA-06-2011-2587-1 to 17	17
Solar RECs	266 IMP140	Solar	11-Apr IMP-WREGIS-REC-140-CA-05-2011-2586-1 to 16	16
Solar RECs	266 IMP114	Solar	11-Apr IMP-WREGIS-REC-114-CA-01-2011-2604-1 to 8	8
Solar RECs	266 IMP114	Solar	11-Apr IMP-WREGIS-REC-114-CA-12-2010-1608-1 to 13	13
Solar RECs	266 IMP114	Solar	11-Apr IMP-WREGIS-REC-114-CA-11-2010-1560-1 to 18	18
Solar RECs	266 IMP114	Solar	11-Apr IMP-WREGIS-REC-114-CA-10-2010-1514-1 to 18	18
Solar RECs	266 IMP114	Solar	11-Apr IMP-WREGIS-REC-114-CA-01-2011-1648-1 to 5	5
Solar RECs	266 IMP114	Solar	11-Apr IMP-WREGIS-REC-114-CA-02-2011-2657-1 to 20	20
Solar RECs	266 IMP114	Solar	11-Apr IMP-WREGIS-REC-114-CA-03-2011-2515-1 to 25	25
Solar RECs	266 IMP115	Solar	11-Apr IMP-WREGIS-REC-115-CA-10-2010-1515-1 to 18	18
Solar RECs	266 IMP115	Solar	11-May IMP-WREGIS-REC-115-CA-11-2010-1561-1 to 18	18
Solar RECs	266 IMP115	Solar	11-May IMP-WREGIS-REC-115-CA-12-2010-1609-1 to 13	13
Solar RECs	266 IMP115	Solar	11-May IMP-WREGIS-REC-115-CA-01-2011-2603-1 to 17	17
Solar RECs	266 IMP115	Solar	11-May IMP-WREGIS-REC-115-CA-03-2011-2514-1 to 27	27
Solar RECs	266 IMP115	Solar	11-May IMP-WREGIS-REC-115-CA-02-2011-2656-1 to 21	21
Solar RECs	266 IMP115	Solar	11-May IMP-WREGIS-REC-115-CA-07-2011-2708-1 to 36	36
Solar RECs	266 IMP280	Solar	11-May IMP-WREGIS-REC-280-CA-06-2011-2591-1 to 68	68
Solar RECs	266 IMP281	Solar	11-May IMP-WREGIS-REC-281-CA-06-2011-2592-1 to 71	71
Solar RECs	266 IMP116	Solar	11-May IMP-WREGIS-REC-116-CA-12-2010-1610-1 to 10	10
Solar RECs	266 IMP116	Solar	11-May IMP-WREGIS-REC-116-CA-11-2010-1562-1 to 15	15
Solar RECs	266 IMP116	Solar	11-May IMP-WREGIS-REC-116-CA-10-2010-1516-1 to 16	16
Solar RECs	266 IMP116	Solar	11-May IMP-WREGIS-REC-116-CA-06-2011-2652-1 to 30	30
Solar RECs	266 IMP116	Solar	11-May IMP-WREGIS-REC-116-CA-07-2011-2706-1 to 30	30
Solar RECs	266 IMP116	Solar	11-May IMP-WREGIS-REC-116-CA-08-2011-2653-23 to 50	28
Solar RECs	266 IMP116	Solar	11-May IMP-WREGIS-REC-116-CA-05-2011-2645-1 to 28	28
Solar RECs	266 IMP258	Solar	11-May IMP-WREGIS-REC-258-CA-12-2010-1645-1 to 1	1
Solar RECs	266 IMP164	Solar	11-May IMP-WREGIS-REC-164-CA-12-2010-1636-1 to 5	5
Solar RECs	266 IMP164	Solar	11-May IMP-WREGIS-REC-164-CA-10-2010-1541-1 to 7	7
Solar RECs	266 IMP164	Solar	11-May IMP-WREGIS-REC-164-CA-11-2010-1588-1 to 3	3
Solar RECs	266 IMP164	Solar	11-May IMP-WREGIS-REC-164-CA-05-2011-2644-1 to 14	14
Solar RECs	266 IMP164	Solar	11-May IMP-WREGIS-REC-164-CA-04-2011-2643-1 to 12	12
Solar RECs	266 IMP164	Solar	11-May IMP-WREGIS-REC-164-CA-08-2011-2532-10 to 21	12
Solar RECs	266 IMP164	Solar	11-May IMP-WREGIS-REC-164-CA-07-2011-2705-1 to 13	13
Solar RECs	266 IMP164	Solar	11-May IMP-WREGIS-REC-164-CA-06-2011-2651-1 to 12	12

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Solar RECs from WREGIS Accounts

Solar RECs	266 IMP165	Solar	11-May IMP-WREG IS-REC-165-CA-11-2010-1589-1 to 6	6
Solar RECs	266 IMP165	Solar	11-May IMP-WREG IS-REC-165-CA-10-2010-1542-1 to 6	6
Solar RECs	266 IMP165	Solar	11-May IMP-WREG IS-REC-165-CA-12-2010-1637-1 to 4	4
Solar RECs	266 IMP165	Solar	11-May IMP-WREG IS-REC-165-CA-06-2011-2605-1 to 9	9
Solar RECs	266 IMP165	Solar	11-May IMP-WREG IS-REC-165-CA-07-2011-2594-1 to 9	9
Solar RECs	266 IMP165	Solar	11-May IMP-WREG IS-REC-165-CA-08-2011-2520-8 to 15	8
Solar RECs	266 IMP165	Solar	11-May IMP-WREG IS-REC-165-CA-04-2011-2624-1 to 8	8
Solar RECs	266 IMP165	Solar	11-May IMP-WREG IS-REC-165-CA-05-2011-2625-1 to 8	8
Solar RECs	266 IMP166	Solar	11-May IMP-WREG IS-REC-166-CA-12-2010-1638-1 to 5	5
Solar RECs	266 IMP166	Solar	11-May IMP-WREG IS-REC-166-CA-10-2010-1543-1 to 6	6
Solar RECs	266 IMP166	Solar	11-May IMP-WREG IS-REC-166-CA-11-2010-1590-1 to 7	7
Solar RECs	266 IMP166	Solar	11-May IMP-WREG IS-REC-166-CA-05-2011-2626-1 to 9	9
Solar RECs	266 IMP166	Solar	11-May IMP-WREG IS-REC-166-CA-07-2011-2595-1 to 10	10
Solar RECs	266 IMP166	Solar	11-May IMP-WREG IS-REC-166-CA-06-2011-2606-1 to 10	10
Solar RECs	266 IMP167	Solar	11-May IMP-WREG IS-REC-167-CA-06-2011-2648-1 to 10	10
Solar RECs	266 IMP167	Solar	11-May IMP-WREG IS-REC-167-CA-07-2011-2703-1 to 10	10
Solar RECs	266 IMP167	Solar	11-May IMP-WREG IS-REC-167-CA-08-2011-2530-1 to 10	10
Solar RECs	266 IMP167	Solar	11-May IMP-WREG IS-REC-167-CA-05-2011-2640-1 to 10	10
Solar RECs	266 IMP167	Solar	11-May IMP-WREG IS-REC-167-CA-04-2011-2639-1 to 9	9
Solar RECs	266 IMP168	Solar	11-May IMP-WREG IS-REC-168-CA-04-2011-2627-1 to 13	13
Solar RECs	266 IMP168	Solar	11-Jun IMP-WREG IS-REC-168-CA-05-2011-2628-1 to 15	15
Solar RECs	266 IMP168	Solar	11-Jun IMP-WREG IS-REC-168-CA-08-2011-2521-11 to 24	14
Solar RECs	266 IMP168	Solar	11-Jun IMP-WREG IS-REC-168-CA-06-2011-2607-1 to 13	13
Solar RECs	266 IMP168	Solar	11-Jun IMP-WREG IS-REC-168-CA-07-2011-2596-1 to 15	15
Solar RECs	266 IMP169	Solar	11-Jun IMP-WREG IS-REC-169-CA-07-2011-2704-1 to 8	8
Solar RECs	266 IMP169	Solar	11-Jun IMP-WREG IS-REC-169-CA-06-2011-2650-1 to 7	7
Solar RECs	266 IMP169	Solar	11-Jun IMP-WREG IS-REC-169-CA-08-2011-2531-6 to 13	8
Solar RECs	266 IMP169	Solar	11-Jun IMP-WREG IS-REC-169-CA-05-2011-2642-1 to 9	9
Solar RECs	266 IMP169	Solar	11-Jun IMP-WREG IS-REC-169-CA-04-2011-2641-1 to 8	8
Solar RECs	266 IMP173	Solar	11-Jun IMP-WREG IS-REC-173-CA-04-2011-2637-1 to 8	8
Solar RECs	266 IMP173	Solar	11-Jun IMP-WREG IS-REC-173-CA-05-2011-2638-1 to 10	10
Solar RECs	266 IMP173	Solar	11-Jun IMP-WREG IS-REC-173-CA-08-2011-2529-8 to 16	9
Solar RECs	266 IMP173	Solar	11-Jun IMP-WREG IS-REC-173-CA-07-2011-2649-1 to 10	10
Solar RECs	266 IMP170	Solar	11-Jun IMP-WREG IS-REC-170-CA-08-2011-2526-13 to 28	16

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Solar RECs from WREGIS Accounts

Solar RECs	266 IMP170	Solar	11-Jun IMP-WREGIS-REC-170-CA-07-2011-2600-1 to 16	16
Solar RECs	266 IMP170	Solar	11-Jun IMP-WREGIS-REC-170-CA-05-2011-2634-1 to 15	15
Solar RECs	266 IMP170	Solar	11-Jun IMP-WREGIS-REC-170-CA-06-2011-2610-1 to 16	16
Solar RECs	266 IMP170	Solar	11-Jun IMP-WREGIS-REC-170-CA-04-2011-2633-1 to 15	15
Solar RECs	266 IMP171	Solar	11-Jun IMP-WREGIS-REC-171-CA-05-2011-2629-1 to 8	8
Solar RECs	266 IMP171	Solar	11-Jun IMP-WREGIS-REC-171-CA-08-2011-2522-7 to 15	9
Solar RECs	266 IMP171	Solar	11-Jun IMP-WREGIS-REC-171-CA-07-2011-2597-1 to 9	9
Solar RECs	266 IMP172	Solar	11-Jun IMP-WREGIS-REC-172-CA-07-2011-2702-1 to 9	9
Solar RECs	266 IMP172	Solar	11-Jun IMP-WREGIS-REC-172-CA-08-2011-2528-7 to 15	9
Solar RECs	266 IMP172	Solar	11-Jun IMP-WREGIS-REC-172-CA-05-2011-2636-1 to 9	9
Solar RECs	266 IMP172	Solar	11-Jun IMP-WREGIS-REC-172-CA-04-2011-2635-1 to 8	8
Solar RECs	266 IMP142	Solar	11-Jun IMP-WREGIS-REC-142-CA-10-2010-1527-1 to 4	4
Solar RECs	266 IMP142	Solar	11-Jun IMP-WREGIS-REC-142-CA-11-2010-1573-1 to 4	4
Solar RECs	266 IMP142	Solar	11-Jun IMP-WREGIS-REC-142-CA-12-2010-1621-1 to 3	3
Solar RECs	266 IMP142	Solar	11-Jun IMP-WREGIS-REC-142-CA-01-2011-1659-1 to 4	4
Solar RECs	266 IMP142	Solar	11-Jun IMP-WREGIS-REC-142-CA-02-2011-1683-1 to 5	5
Solar RECs	266 IMP142	Solar	11-Jun IMP-WREGIS-REC-142-CA-03-2011-1706-1 to 8	8
Solar RECs	266 IMP268	Solar	11-Jun IMP-WREGIS-REC-268-CA-03-2011-2454-1 to 129	129
Solar RECs	266 IMP268	Solar	11-Jun IMP-WREGIS-REC-268-CA-04-2011-2466-1 to 213	213
Solar RECs	266 IMP268	Solar	11-Jun IMP-WREGIS-REC-268-CA-02-2011-2446-1 to 117	117
Solar RECs	266 IMP268	Solar	11-Jun IMP-WREGIS-REC-268-CA-01-2011-2436-1 to 74	74
Solar RECs	266 IMP269	Solar	11-Jun IMP-WREGIS-REC-269-CA-01-2011-2437-1 to 46	46
Solar RECs	266 IMP269	Solar	11-Jul IMP-WREGIS-REC-269-CA-02-2011-2447-1 to 49	49
Solar RECs	266 IMP269	Solar	11-Jul IMP-WREGIS-REC-269-CA-04-2011-2467-1 to 76	76
Solar RECs	266 IMP269	Solar	11-Jul IMP-WREGIS-REC-269-CA-03-2011-2455-1 to 67	67
Solar RECs	266 IMP270	Solar	11-Jul IMP-WREGIS-REC-270-CA-03-2011-2456-1 to 32	32
Solar RECs	266 IMP270	Solar	11-Jul IMP-WREGIS-REC-270-CA-04-2011-2468-1 to 36	36
Solar RECs	266 IMP270	Solar	11-Jul IMP-WREGIS-REC-270-CA-02-2011-2448-1 to 23	23
Solar RECs	266 IMP270	Solar	11-Jul IMP-WREGIS-REC-270-CA-01-2011-2438-1 to 22	22
Solar RECs	266 IMP277	Solar	11-Jul IMP-WREGIS-REC-277-CA-01-2011-2444-1 to 6	6
Solar RECs	266 IMP277	Solar	11-Jul IMP-WREGIS-REC-277-CA-03-2011-2463-1 to 9	9
Solar RECs	266 IMP277	Solar	11-Jul IMP-WREGIS-REC-277-CA-05-2011-2483-1 to 12	12
Solar RECs	266 IMP277	Solar	11-Jul IMP-WREGIS-REC-277-CA-04-2011-2475-1 to 10	10
Solar RECs	266 IMP273	Solar	11-Jul IMP-WREGIS-REC-273-CA-05-2011-2479-1 to 12	12

Exhibit 1 **Solar RECs from WREGIS Accounts**

Solar RECs	266 IMP273	Solar	11-Jul IMP-WREG IS-REC-273-CA-03-2011-2459-1 to 10	10
Solar RECs	266 IMP273	Solar	11-Jul IMP-WREG IS-REC-273-CA-04-2011-2471-1 to 11	11
Solar RECs	266 IMP273	Solar	11-Jul IMP-WREG IS-REC-273-CA-02-2011-2451-1 to 8	8
Solar RECs	266 IMP273	Solar	11-Jul IMP-WREG IS-REC-273-CA-01-2011-2441-1 to 7	7
Solar RECs	266 IMP272	Solar	11-Jul IMP-WREG IS-REC-272-CA-01-2011-2440-1 to 9	9
Solar RECs	266 IMP272	Solar	11-Aug IMP-WREG IS-REC-272-CA-02-2011-2450-1 to 10	10
Solar RECs	266 IMP272	Solar	11-Aug IMP-WREG IS-REC-272-CA-04-2011-2470-1 to 14	14
Solar RECs	266 IMP272	Solar	11-Aug IMP-WREG IS-REC-272-CA-03-2011-2458-1 to 11	11
Solar RECs	266 IMP272	Solar	11-Aug IMP-WREG IS-REC-272-CA-05-2011-2478-1 to 15	15
Solar RECs	266 IMP275	Solar	11-Aug IMP-WREG IS-REC-275-CA-05-2011-2481-1 to 12	12
Solar RECs	266 IMP275	Solar	11-Aug IMP-WREG IS-REC-275-CA-03-2011-2461-1 to 9	9
Solar RECs	266 IMP275	Solar	11-Aug IMP-WREG IS-REC-275-CA-04-2011-2473-1 to 10	10
Solar RECs	266 IMP275	Solar	11-Aug IMP-WREG IS-REC-275-CA-01-2011-2442-1 to 3	3
Solar RECs	266 IMP169	Solar	11-Aug IMP-WREG IS-REC-169-CA-10-2010-1545-1 to 4	4
Solar RECs	266 IMP169	Solar	11-Aug IMP-WREG IS-REC-169-CA-11-2010-1592-1 to 5	5
Solar RECs	266 IMP169	Solar	11-Aug IMP-WREG IS-REC-169-CA-12-2010-1640-1 to 4	4
Solar RECs	266 IMP170	Solar	11-Aug IMP-WREG IS-REC-170-CA-12-2010-1641-1 to 5	5
Solar RECs	266 IMP170	Solar	11-Aug IMP-WREG IS-REC-170-CA-10-2010-1546-1 to 10	10
Solar RECs	266 IMP170	Solar	11-Aug IMP-WREG IS-REC-170-CA-11-2010-1593-1 to 8	8
				9605
Solar RECs	266 IMP274	Solar	10-Oct IMP-WREG IS-REC-274-CA-04-2011-2472-1 to 34	34
Solar RECs	266 IMP274	Solar	10-Oct IMP-WREG IS-REC-274-CA-03-2011-2460-1 to 8	8
Solar RECs	266 IMP274	Solar	10-Oct IMP-WREG IS-REC-274-CA-05-2011-2480-1 to 10	10
Solar RECs	266 IMP276	Solar	10-Oct IMP-WREG IS-REC-276-CA-05-2011-2482-1 to 70	70
Solar RECs	266 IMP276	Solar	10-Oct IMP-WREG IS-REC-276-CA-03-2011-2462-1 to 57	57
Solar RECs	266 IMP276	Solar	10-Oct IMP-WREG IS-REC-276-CA-04-2011-2474-1 to 83	83
Solar RECs	266 IMP276	Solar	10-Oct IMP-WREG IS-REC-276-CA-02-2011-2452-1 to 50	50
Solar RECs	266 IMP276	Solar	10-Oct IMP-WREG IS-REC-276-CA-01-2011-2443-1 to 23	23
Solar RECs	266 IMP168	Solar	10-Oct IMP-WREG IS-REC-168-CA-12-2010-1639-1 to 6	6
Solar RECs	266 IMP168	Solar	10-Oct IMP-WREG IS-REC-168-CA-10-2010-1544-1 to 8	8
Solar RECs	266 IMP168	Solar	10-Oct IMP-WREG IS-REC-168-CA-11-2010-1591-1 to 9	9
Solar RECs	266 IMP172	Solar	10-Oct IMP-WREG IS-REC-172-CA-11-2010-1595-1 to 7	7
Solar RECs	266 IMP172	Solar	10-Oct IMP-WREG IS-REC-172-CA-10-2010-1548-1 to 6	6
Solar RECs	266 IMP172	Solar	10-Oct IMP-WREG IS-REC-172-CA-12-2010-1643-1 to 4	4

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Solar RECs from WREGIS Accounts

Solar RECs	266 IMP171	Solar	10-Oct IMP-WREG IS-REC-171-CA-11-2010-1594-1 to 6	6
Solar RECs	266 IMP171	Solar	10-Oct IMP-WREG IS-REC-171-CA-10-2010-1547-1 to 5	5
Solar RECs	266 IMP171	Solar	10-Oct IMP-WREG IS-REC-171-CA-12-2010-1642-1 to 5	5
Solar RECs	266 IMP271	Solar	10-Oct IMP-WREG IS-REC-271-CA-01-2011-2439-1 to 47	47
Solar RECs	266 IMP271	Solar	10-Oct IMP-WREG IS-REC-271-CA-02-2011-2449-1 to 53	53
Solar RECs	266 IMP271	Solar	10-Oct IMP-WREG IS-REC-271-CA-04-2011-2469-1 to 66	66
Solar RECs	266 IMP271	Solar	10-Oct IMP-WREG IS-REC-271-CA-03-2011-2457-1 to 59	59
Solar RECs	266 IMP278	Solar	10-Oct IMP-WREG IS-REC-278-CA-03-2011-2464-1 to 9	9
Solar RECs	266 IMP278	Solar	10-Oct IMP-WREG IS-REC-278-CA-04-2011-2476-1 to 8	8
Solar RECs	266 IMP278	Solar	10-Oct IMP-WREG IS-REC-278-CA-02-2011-2453-1 to 5	5
Solar RECs	266 IMP278	Solar	10-Oct IMP-WREG IS-REC-278-CA-01-2011-2445-1 to 5	5
Solar RECs	266 IMP174	Solar	10-Oct IMP-WREG IS-REC-174-CA-11-2010-1596-1 to 3	3
Solar RECs	266 IMP174	Solar	10-Oct IMP-WREG IS-REC-174-CA-10-2010-1549-1 to 4	4
Solar RECs	266 IMP143	Solar	10-Oct IMP-WREG IS-REC-143-CA-10-2010-1528-1 to 4	4
Solar RECs	266 IMP143	Solar	10-Oct IMP-WREG IS-REC-143-CA-11-2010-1574-1 to 4	4
Solar RECs	266 IMP143	Solar	10-Oct IMP-WREG IS-REC-143-CA-12-2010-1622-1 to 2	2
Solar RECs	266 IMP143	Solar	10-Oct IMP-WREG IS-REC-143-CA-01-2011-1660-1 to 3	3
Solar RECs	266 IMP143	Solar	10-Oct IMP-WREG IS-REC-143-CA-02-2011-1684-1 to 3	3
Solar RECs	266 IMP143	Solar	10-Oct IMP-WREG IS-REC-143-CA-03-2011-1707-1 to 3	3
Solar RECs	266 IMP144	Solar	10-Oct IMP-WREG IS-REC-144-CA-03-2011-1708-1 to 3	3
Solar RECs	266 IMP144	Solar	10-Oct IMP-WREG IS-REC-144-CA-01-2011-1661-1 to 3	3
Solar RECs	266 IMP144	Solar	10-Oct IMP-WREG IS-REC-144-CA-02-2011-1685-1 to 3	3
Solar RECs	266 IMP144	Solar	10-Nov IMP-WREG IS-REC-144-CA-12-2010-1623-1 to 2	2
Solar RECs	266 IMP144	Solar	10-Nov IMP-WREG IS-REC-144-CA-10-2010-1529-1 to 3	3
Solar RECs	266 IMP144	Solar	10-Nov IMP-WREG IS-REC-144-CA-11-2010-1575-1 to 3	3
Solar RECs	266 IMP145	Solar	10-Nov IMP-WREG IS-REC-145-CA-11-2010-1576-1 to 2	2
Solar RECs	266 IMP145	Solar	10-Nov IMP-WREG IS-REC-145-CA-10-2010-1530-1 to 3	3
Solar RECs	266 IMP145	Solar	10-Nov IMP-WREG IS-REC-145-CA-12-2010-1624-1 to 2	2
Solar RECs	266 IMP145	Solar	10-Nov IMP-WREG IS-REC-145-CA-02-2011-1686-1 to 3	3
Solar RECs	266 IMP145	Solar	10-Nov IMP-WREG IS-REC-145-CA-01-2011-1662-1 to 2	2
Solar RECs	266 IMP145	Solar	10-Nov IMP-WREG IS-REC-145-CA-03-2011-1709-1 to 3	3
Solar RECs	266 IMP146	Solar	10-Nov IMP-WREG IS-REC-146-CA-01-2011-1663-1 to 11	11
Solar RECs	266 IMP146	Solar	10-Nov IMP-WREG IS-REC-146-CA-12-2010-1625-1 to 8	8
Solar RECs	266 IMP146	Solar	10-Nov IMP-WREG IS-REC-146-CA-10-2010-1531-1 to 11	11

Exhibit 1 **Solar RECs from WREGIS Accounts**

Solar RECs	266 IMP146	Solar	10-Nov IMP-WREG IS-REC-146-CA-11-2010-1577-1 to 12	12
Solar RECs	266 IMP146	Solar	10-Nov IMP-WREG IS-REC-146-CA-02-2011-2658-1 to 13	13
Solar RECs	266 IMP146	Solar	10-Nov IMP-WREG IS-REC-146-CA-03-2011-2517-1 to 16	16
Solar RECs	266 IMP117	Solar	10-Nov IMP-WREG IS-REC-117-CA-01-2011-1649-1 to 10	10
Solar RECs	266 IMP117	Solar	10-Nov IMP-WREG IS-REC-117-CA-10-2010-1517-1 to 27	27
Solar RECs	266 IMP117	Solar	10-Nov IMP-WREG IS-REC-117-CA-11-2010-1563-1 to 16	16
Solar RECs	266 IMP117	Solar	10-Nov IMP-WREG IS-REC-117-CA-12-2010-1611-1 to 16	16
Solar RECs	266 IMP117	Solar	10-Nov IMP-WREG IS-REC-117-CA-02-2011-2659-1 to 19	19
Solar RECs	266 IMP117	Solar	10-Nov IMP-WREG IS-REC-117-CA-03-2011-2518-1 to 22	22
Solar RECs	266 IMP148	Solar	10-Nov IMP-WREG IS-REC-148-CA-03-2011-1710-1 to 5	5
Solar RECs	266 IMP148	Solar	10-Nov IMP-WREG IS-REC-148-CA-02-2011-1688-1 to 4	4
Solar RECs	266 IMP148	Solar	10-Nov IMP-WREG IS-REC-148-CA-01-2011-1665-1 to 4	4
Solar RECs	266 IMP148	Solar	10-Nov IMP-WREG IS-REC-148-CA-12-2010-1627-1 to 3	3
Solar RECs	266 IMP148	Solar	10-Nov IMP-WREG IS-REC-148-CA-11-2010-1579-1 to 4	4
Solar RECs	266 IMP148	Solar	10-Nov IMP-WREG IS-REC-148-CA-10-2010-1533-1 to 4	4
Solar RECs	266 IMP147	Solar	10-Nov IMP-WREG IS-REC-147-CA-10-2010-1532-1 to 11	11
Solar RECs	266 IMP147	Solar	10-Nov IMP-WREG IS-REC-147-CA-11-2010-1578-1 to 10	10
Solar RECs	266 IMP147	Solar	10-Nov IMP-WREG IS-REC-147-CA-12-2010-1626-1 to 7	7
Solar RECs	266 IMP147	Solar	10-Nov IMP-WREG IS-REC-147-CA-01-2011-1664-1 to 9	9
Solar RECs	266 IMP147	Solar	10-Nov IMP-WREG IS-REC-147-CA-02-2011-1687-1 to 10	10
Solar RECs	266 IMP147	Solar	10-Nov IMP-WREG IS-REC-147-CA-03-2011-2516-1 to 13	13
Solar RECs	266 IMP149	Solar	10-Nov IMP-WREG IS-REC-149-CA-03-2011-1711-1 to 8	8
Solar RECs	266 IMP149	Solar	10-Nov IMP-WREG IS-REC-149-CA-02-2011-1689-1 to 7	7
Solar RECs	266 IMP149	Solar	10-Nov IMP-WREG IS-REC-149-CA-01-2011-1666-1 to 6	6
Solar RECs	266 IMP149	Solar	10-Nov IMP-WREG IS-REC-149-CA-11-2010-1580-1 to 6	6
Solar RECs	266 IMP149	Solar	10-Nov IMP-WREG IS-REC-149-CA-12-2010-1628-1 to 5	5
Solar RECs	266 IMP149	Solar	10-Nov IMP-WREG IS-REC-149-CA-10-2010-1534-1 to 6	6
Solar RECs	266 IMP150	Solar	10-Nov IMP-WREG IS-REC-150-CA-11-2010-1581-1 to 7	7
Solar RECs	266 IMP150	Solar	10-Nov IMP-WREG IS-REC-150-CA-12-2010-1629-1 to 3	3
Solar RECs	266 IMP150	Solar	10-Nov IMP-WREG IS-REC-150-CA-01-2011-1667-1 to 6	6
Solar RECs	266 IMP150	Solar	10-Nov IMP-WREG IS-REC-150-CA-02-2011-1690-1 to 7	7
Solar RECs	266 IMP150	Solar	10-Nov IMP-WREG IS-REC-150-CA-03-2011-1712-1 to 8	8
Solar RECs	266 IMP151	Solar	10-Nov IMP-WREG IS-REC-151-CA-03-2011-1713-1 to 4	4
Solar RECs	266 IMP151	Solar	10-Nov IMP-WREG IS-REC-151-CA-02-2011-1691-1 to 3	3

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Solar RECs from WREGIS Accounts

Solar RECs	266 IMP151	Solar	10-Dec IMP-WREGIS-REC-151-CA-01-2011-1668-1 to 3	3
Solar RECs	266 IMP151	Solar	10-Dec IMP-WREGIS-REC-151-CA-12-2010-1630-1 to 3	3
Solar RECs	266 IMP151	Solar	10-Dec IMP-WREGIS-REC-151-CA-11-2010-1582-1 to 3	3
Solar RECs	266 IMP151	Solar	10-Dec IMP-WREGIS-REC-151-CA-10-2010-1535-1 to 2	2
Solar RECs	266 IMP152	Solar	10-Dec IMP-WREGIS-REC-152-CA-01-2011-2684-1 to 9	9
Solar RECs	266 IMP152	Solar	10-Dec IMP-WREGIS-REC-152-CA-01-2011-2542-1 to 2	2
Solar RECs	266 IMP152	Solar	10-Dec IMP-WREGIS-REC-152-CA-02-2011-2685-1 to 13	13
Solar RECs	266 IMP152	Solar	10-Dec IMP-WREGIS-REC-152-CA-03-2011-2555-1 to 17	17
Solar RECs	266 IMP152	Solar	10-Dec IMP-WREGIS-REC-152-CA-04-2011-2700-1 to 26	26
Solar RECs	266 IMP152	Solar	10-Dec IMP-WREGIS-REC-152-CA-05-2011-2588-1 to 27	27
Solar RECs	266 IMP152	Solar	10-Dec IMP-WREGIS-REC-152-CA-06-2011-2589-1 to 28	28
Solar RECs	266 IMP153	Solar	10-Dec IMP-WREGIS-REC-153-CA-03-2011-1714-1 to 9	9
Solar RECs	266 IMP153	Solar	10-Dec IMP-WREGIS-REC-153-CA-02-2011-1692-1 to 7	7
Solar RECs	266 IMP153	Solar	10-Dec IMP-WREGIS-REC-153-CA-01-2011-1669-1 to 7	7
Solar RECs	266 IMP153	Solar	10-Dec IMP-WREGIS-REC-153-CA-12-2010-1631-1 to 5	5
Solar RECs	266 IMP153	Solar	10-Dec IMP-WREGIS-REC-153-CA-10-2010-1536-1 to 6	6
Solar RECs	266 IMP153	Solar	10-Dec IMP-WREGIS-REC-153-CA-11-2010-1583-1 to 7	7
Solar RECs	266 IMP174	Solar	10-Dec IMP-WREGIS-REC-174-CA-07-2011-2599-1 to 2	2
Solar RECs	266 IMP174	Solar	10-Dec IMP-WREGIS-REC-174-CA-08-2011-2525-7 to 14	8
Solar RECs	266 IMP174	Solar	10-Dec IMP-WREGIS-REC-174-CA-05-2011-2632-1 to 4	4
Solar RECs	266 IMP154	Solar	10-Dec IMP-WREGIS-REC-154-CA-11-2010-1584-1 to 9	9
Solar RECs	266 IMP154	Solar	10-Dec IMP-WREGIS-REC-154-CA-10-2010-1537-1 to 5	5
Solar RECs	266 IMP154	Solar	10-Dec IMP-WREGIS-REC-154-CA-12-2010-1632-1 to 5	5
Solar RECs	266 IMP154	Solar	10-Dec IMP-WREGIS-REC-154-CA-02-2011-1693-1 to 9	9
Solar RECs	266 IMP154	Solar	10-Dec IMP-WREGIS-REC-154-CA-03-2011-1715-1 to 9	9
Solar RECs	266 IMP155	Solar	10-Dec IMP-WREGIS-REC-155-CA-03-2011-1716-1 to 7	7
Solar RECs	266 IMP155	Solar	10-Dec IMP-WREGIS-REC-155-CA-02-2011-1694-1 to 4	4
Solar RECs	266 IMP155	Solar	10-Dec IMP-WREGIS-REC-155-CA-01-2011-1670-1 to 3	3
Solar RECs	266 IMP155	Solar	10-Dec IMP-WREGIS-REC-155-CA-12-2010-1633-1 to 3	3
Solar RECs	266 IMP155	Solar	10-Dec IMP-WREGIS-REC-155-CA-10-2010-1538-1 to 5	5
Solar RECs	266 IMP155	Solar	10-Dec IMP-WREGIS-REC-155-CA-11-2010-1585-1 to 4	4
Solar RECs	266 IMP156	Solar	10-Dec IMP-WREGIS-REC-156-CA-11-2010-1586-1 to 10	10
Solar RECs	266 IMP156	Solar	10-Dec IMP-WREGIS-REC-156-CA-10-2010-1539-1 to 9	9
Solar RECs	266 IMP156	Solar	10-Dec IMP-WREGIS-REC-156-CA-12-2010-1634-1 to 4	4

Exhibit 1 **Solar RECs from WREGIS Accounts**

Solar RECs	266 IMP156	Solar	10-Dec IMP-WREGIS-REC-156-CA-01-2011-1671-1 to 1	1
Solar RECs	266 IMP156	Solar	10-Dec IMP-WREGIS-REC-156-CA-02-2011-1695-1 to 2	2
Solar RECs	266 IMP156	Solar	10-Dec IMP-WREGIS-REC-156-CA-03-2011-1717-1 to 2	2
Solar RECs	266 IMP157	Solar	10-Dec IMP-WREGIS-REC-157-CA-02-2011-1696-1 to 8	8
Solar RECs	266 IMP157	Solar	10-Dec IMP-WREGIS-REC-157-CA-12-2010-1635-1 to 6	6
Solar RECs	266 IMP157	Solar	10-Dec IMP-WREGIS-REC-157-CA-01-2011-1672-1 to 6	6
Solar RECs	266 IMP157	Solar	10-Dec IMP-WREGIS-REC-157-CA-10-2010-1540-1 to 7	7
Solar RECs	266 IMP157	Solar	10-Dec IMP-WREGIS-REC-157-CA-11-2010-1587-1 to 7	7
Solar RECs	266 IMP158	Solar	10-Dec IMP-WREGIS-REC-158-CA-01-2011-2686-1 to 7	7
Solar RECs	266 IMP158	Solar	10-Dec IMP-WREGIS-REC-158-CA-02-2011-2687-1 to 11	11
Solar RECs	266 IMP158	Solar	10-Dec IMP-WREGIS-REC-158-CA-03-2011-2556-1 to 13	13
Solar RECs	266 IMP158	Solar	10-Dec IMP-WREGIS-REC-158-CA-04-2011-2701-1 to 21	21
Solar RECs	266 IMP158	Solar	10-Dec IMP-WREGIS-REC-158-CA-06-2011-2590-1 to 23	23
				1430
				11035

During CY 2011, an additional 4,000 S-RECs were contracted for, but because they are 2012 vintage, these additional S-RECs will not be transferred to Ameren Missouri's NAR account until the end of CY 2012.

Exhibit 1
Customer Systems <10 kW

City	State	Zip	Generation Source	Name Plate (kW)	2011 SRE C
Holts Summit	MO	65043	Photovoltaic Solar	9.66	8.36
New Florence	MO	63363	Photovoltaic Solar	9.87	2.09
Chesterfield	MO	63005	Photovoltaic Solar	9.856	4.21
Jefferson City	MO	65109	Photovoltaic Solar	9.87	5.65
Manchester	MO	63011	Photovoltaic Solar	7.92	9.51
St. John	MO	63114	Photovoltaic Solar	3.075	2.72
Boonville	MO	65233	Photovoltaic Solar	9.87	4.25
Kaiser	MO	65047	Photovoltaic Solar	8.28	4.80
Sunset Hills	MO	63127	Photovoltaic Solar	9.87	5.21
DeSoto	MO	63020	Photovoltaic Solar	5.17	6.50
DeSoto	MO	63020	Photovoltaic Solar	4.7	5.90
Hillsboro	MO	63050	Photovoltaic Solar	3.055	3.90
St. Louis	MO	63112	Photovoltaic Solar	4.1	3.33
St. Louis	MO	65270	Photovoltaic Solar	9.87	3.32
Jefferson City	MO	65109	Photovoltaic Solar	9.66	9.73
St. Louis	MO	63106	Photovoltaic Solar	6.58	3.93
St. Louis	MO	63104	Photovoltaic Solar	1.88	2.28
St. Louis	MO	63104	Photovoltaic Solar	1.88	2.28
St. Louis	MO	63104	Photovoltaic Solar	1.88	2.28
St. Louis	MO	63104	Photovoltaic Solar	1.88	2.28
St. Louis	MO	63104	Photovoltaic Solar	1.88	2.28
St. Louis	MO	63104	Photovoltaic Solar	6.11	7.70
St. Louis	MO	63104	Photovoltaic Solar	4.23	5.40
St. Louis	MO	63104	Photovoltaic Solar	2.35	3.00
St. Louis	MO	63104	Photovoltaic Solar	2.35	3.00
St. Louis	MO	63104	Photovoltaic Solar	2.35	3.00
St. Louis	MO	63104	Photovoltaic Solar	5.17	6.50
St. Louis	MO	63104	Photovoltaic Solar	4.935	6.20
St. Louis	MO	63104	Photovoltaic Solar	1.88	2.28
St. Louis	MO	63104	Photovoltaic Solar	1.88	2.28
St. Louis	MO	63106	Photovoltaic Solar	4.7	3.14
St. Louis	MO	63106	Photovoltaic Solar	3.76	2.55
St. Louis	MO	63106	Photovoltaic Solar	2.35	1.59
St. Louis	MO	63106	Photovoltaic Solar	3.29	2.23
St. Louis	MO	63106	Photovoltaic Solar	3.29	2.23
St. Louis	MO	63106	Photovoltaic Solar	1.645	1.12
St. Louis	MO	63106	Photovoltaic Solar	5.17	3.42
St. Louis	MO	63106	Photovoltaic Solar	4.23	2.87
St. Louis	MO	63106	Photovoltaic Solar	3.29	2.20
St. Louis	MO	63106	Photovoltaic Solar	1.88	1.28
St. Louis	MO	63106	Photovoltaic Solar	1.175	0.80
St. Louis	MO	63104	Photovoltaic Solar	9.635	11.33
St. Louis	MO	63104	Photovoltaic Solar	9.4	11.05
St. Louis	MO	63104	Photovoltaic Solar	8.225	9.66
St. Louis	MO	63104	Photovoltaic Solar	7.99	9.38
St. Louis	MO	63104	Photovoltaic Solar	4.7	5.48
St. Louis	MO	63104	Photovoltaic Solar	6.58	7.71
St. Louis	MO	63106	Photovoltaic Solar	2.35	1.53
St. Louis	MO	63106	Photovoltaic Solar	6.11	4.05
St. Louis	MO	63106	Photovoltaic Solar	4.23	2.83

Exhibit 1
Customer Systems <10kW

St. Louis	MO	63106	Photovoltaic Solar	4.7	3.10
St. Louis	MO	63106	Photovoltaic Solar	2.35	1.58
St. Louis	MO	63106	Photovoltaic Solar	9.4	6.26
St. Louis	MO	63106	Photovoltaic Solar	3.995	2.67
St. Louis	MO	63106	Photovoltaic Solar	6.58	4.34
St. Louis	MO	63106	Photovoltaic Solar	5.6	3.72
St. Louis	MO	63106	Photovoltaic Solar	3.29	2.20
St. Louis	MO	63106	Photovoltaic Solar	3.76	2.52
St. Louis	MO	63106	Photovoltaic Solar	8.225	5.47
St. Louis	MO	63106	Photovoltaic Solar	2.585	1.68
St. Louis	MO	63106	Photovoltaic Solar	4.23	2.83
St. Louis	MO	63106	Photovoltaic Solar	2.35	1.58
St. Louis	MO	63106	Photovoltaic Solar	1.88	1.26
St. Louis	MO	63106	Photovoltaic Solar	3.76	2.52
St. Louis	MO	63106	Photovoltaic Solar	3.29	2.21
St. Louis	MO	63106	Photovoltaic Solar	7.285	4.84
St. Louis	MO	63106	Photovoltaic Solar	4.7	3.10
St. Louis	MO	63106	Photovoltaic Solar	1.88	1.26
St. Louis	MO	63106	Photovoltaic Solar	2.35	1.57
St. Louis	MO	63106	Photovoltaic Solar	2.82	1.88
St. Louis	MO	63106	Photovoltaic Solar	7.05	4.68
St. Louis	MO	63106	Photovoltaic Solar	4.7	3.09
St. Louis	MO	63106	Photovoltaic Solar	2.35	1.57
St. Louis	MO	63106	Photovoltaic Solar	1.41	0.94
St. Louis	MO	63106	Photovoltaic Solar	1.88	1.20
St. Louis	MO	63106	Photovoltaic Solar	8.225	5.27
St. Louis	MO	63106	Photovoltaic Solar	2.35	1.58
St. Louis	MO	63106	Photovoltaic Solar	3.76	2.51
St. Louis	MO	63106	Photovoltaic Solar	8.46	5.42
Holts Summit	MO	65043-1339	Photovoltaic Solar	9.87	5.45
Winfield	MO	63389	Photovoltaic Solar	7.095	9.40
St. Louis	MO	63130-4899	Photovoltaic Solar	8.61	10.90
St. Louis	MO	63146	Photovoltaic Solar	3.52	2.35
Richmond Heights	MO	63117	Photovoltaic Solar	1.88	2.40
St. Louis	MO	63109	Photovoltaic Solar	3.055	3.26
St. Charles	MO	63303	Photovoltaic Solar	8.28	9.32
Wildwood	MO	63005	Photovoltaic Solar	5.17	2.36
Jefferson City	MO	65109	Photovoltaic Solar	9.87	7.53
Washington	MO	63090	Photovoltaic Solar	4.6	3.92
Cape Girardeau	MO	63701	Photovoltaic Solar	2.025	2.60
Lawson	MO	64062	Photovoltaic Solar	4.6	3.40
St. Louis	MO	63129	Photovoltaic Solar	8.25	9.66
St. Charles	MO	63303	Photovoltaic Solar	5.4	4.34
St. Louis	MO	63131	Photovoltaic Solar	5.76	1.62
Imperial	MO	63052	Photovoltaic Solar	9.2	9.47
Cedar Hill	MO	63016	Photovoltaic Solar	2.856	1.71
Des Peres	MO	63131	Photovoltaic Solar	9.2	8.20
St. Louis	MO	63043	Photovoltaic Solar	3.57	4.50
Union	MO	63084	Photovoltaic Solar	9.66	5.75
Webster Groves	MO	63119	Photovoltaic Solar	3.6	4.60
Holts Summit	MO	65043	Photovoltaic Solar	9.87	5.96
Jefferson City	MO	65109	Photovoltaic Solar	9.87	7.53
Clayton	MO	63105	Photovoltaic Solar	4.14	5.20
St. Louis	MO	63109	Photovoltaic Solar	5.85	2.33
Dexter	MO	63841	Photovoltaic Solar	3.29	1.58

Exhibit 1
Customer Systems <10 kW

Maplewood	MO	63143	Photovoltaic Solar	2.115	2.70
Warrenton	MO	63383	Photovoltaic Solar	9.89	4.69
Excelsior Springs	MO	64024	Photovoltaic Solar	5.16	5.31
St. Louis	MO	63129	Photovoltaic Solar	3.76	2.92
Chesterfield	MO	63017	Photovoltaic Solar	8.7	11.00
Ashland	MO	65010	Photovoltaic Solar	3.36	4.30
Ashland	MO	65010	Photovoltaic Solar	5.4	3.19
Clayton	MO	63105	Photovoltaic Solar	4.14	5.20
Sunrise Beach	MO	65079	Photovoltaic Solar	6.21	7.90
St. Louis	MO	63110	Photovoltaic Solar	5.712	6.02
Imperial	MO	63052	Photovoltaic Solar	2	2.50
Union	MO	63084	Photovoltaic Solar	0.455	0.39
Creve Coeur	MO	63141	Photovoltaic Solar	9.996	4.69
Hillsboro	MO	63050	Photovoltaic Solar	5.06	2.93
St. Louis	MO	63126	Photovoltaic Solar	4.14	2.38
Lake Ozarks	MO	65049	Photovoltaic Solar	1.4	1.80
St. Louis	MO	63122	Photovoltaic Solar	4.5	3.70
Fenton	MO	63026	Photovoltaic Solar	6.21	7.90
Creve Coeur	MO	63141	Photovoltaic Solar	2.73	3.50
St. Louis	MO	63104	Photovoltaic Solar	1.84	2.30
Lake Ozark	MO	65049	Photovoltaic Solar	5.52	4.37
Town & Country	MO	63017	Photovoltaic Solar	3.6	1.29
Eureka	MO	63025	Photovoltaic Solar	4.032	4.54
Jefferson City	MO	65101	Photovoltaic Solar	9.66	9.49
St. Louis	MO	63141	Photovoltaic Solar	6.72	3.20
St. Louis	MO	63128	Photovoltaic Solar	4.95	6.30
Union	MO	63084	Photovoltaic Solar	5.76	3.44
Clarksville	MO	63336	Photovoltaic Solar	7.8	7.84
St. Louis	MO	63128	Photovoltaic Solar	9.84	1.61
Kirkwood	MO	63122	Photovoltaic Solar	9.2	9.50
Olivette	MO	63132	Photovoltaic Solar	4.68	5.90
St. Louis	MO	63146	Photovoltaic Solar	5.06	2.81
Jefferson City	MO	63101	Photovoltaic Solar	3.96	5.00
Jefferson City	MO	65101	Photovoltaic Solar	5.17	2.94
St. Louis	MO	63137	Photovoltaic Solar	9.6	11.27
Richmond Hts.	MO	63117	Photovoltaic Solar	2.4	3.00
Pacific	MO	63069	Photovoltaic Solar	0.21	0.30
Pacific	MO	63069	Photovoltaic Solar	0.21	0.30
Pacific	MO	63069	Photovoltaic Solar	0.21	0.30
Pacific	MO	63069	Photovoltaic Solar	0.21	0.30
Pacific	MO	63069	Photovoltaic Solar	0.21	0.30
Pacific	MO	63069	Photovoltaic Solar	0.21	0.30
Pacific	MO	63069	Photovoltaic Solar	0.21	0.30
Pacific	MO	63069	Photovoltaic Solar	0.21	0.30
Excelsior Springs	MO	64024	Photovoltaic Solar	1.728	2.20
St. Louis	MO	63111	Photovoltaic Solar	2	2.50
Ballwin	MO	63011	Photovoltaic Solar	2.45	3.10
St. Louis	MO	63102	Photovoltaic Solar	3.5	4.40
Kirkwood	MO	63122	Photovoltaic Solar	0.612	0.80
Hermann	MO	65041	Photovoltaic Solar	1.8	2.30
St. Louis	MO	63138	Photovoltaic Solar	2.45	3.10
Farmington	MO	63640	Photovoltaic Solar	2.8	3.50
Wildwood	MO	63011	Photovoltaic Solar	1.8	2.30
St. Louis	MO	63128	Photovoltaic Solar	3.8	4.80
Wildwood	MO	63038	Photovoltaic Solar	4.68	5.90

Exhibit 1
Customer Systems <10 kW

De Soto	MO	63020	Photovoltaic Solar	1.8	2.30
Washington	MO	63090	Photovoltaic Solar	1.8	2.30
Hillsboro	MO	63069	Photovoltaic Solar	3.51	4.40
Richmond Heights	MO	63117	Photovoltaic Solar	2.1	2.70
St. Louis	MO	63141	Photovoltaic Solar	4.008	5.10
Farmington	MO	63640	Photovoltaic Solar	1.95	2.50
Ladue	MO	63124	Photovoltaic Solar	4	5.10
Eldon	MO	65026	Photovoltaic Solar	5.06	2.47
Eureka	MO	63025	Photovoltaic Solar	9.87	4.73
St. Louis	MO	63104	Photovoltaic Solar	3.36	1.70
Cape Girardeau	MO	63701	Photovoltaic Solar	1.33	0.19
				801.065	679.7

Exhibit 1
Customer Systems >10kW

City	State	Zip	Year Installed	Name Plate (kW)	
O'Fallon	MO	63366	2011	Photovoltaic Solar	25.2
St. Peters	MO	63376	2011	Photovoltaic Solar	36.036
St. Louis	MO	63116	2011	Photovoltaic Solar	24.94
Versailles	MO	65084	2011	Photovoltaic Solar	13.8
Desoto	MO	63020	2011	Photovoltaic Solar	12.65
Desoto	MO	63020	2011	Photovoltaic Solar	12.65
St. Louis	MO	63111	2010	Photovoltaic Solar	25.8
St. Louis	MO	63110	2010	Photovoltaic Solar	25.8
St. Louis	MO	63147	2011	Photovoltaic Solar	25.53
Jefferson City	MO	65109	2011	Photovoltaic Solar	12.88
St. Louis	MO	63110	2011	Photovoltaic Solar	25
Olivette	MO	63132	2011	Photovoltaic Solar	14.95
St. Louis	MO	63104	2011	Photovoltaic Solar	24.96
St. Louis	MO	63106	2011	Photovoltaic Solar	11.75
St. Louis	MO	63106	2011	Photovoltaic Solar	18.33
St. Louis	MO	63104	2011	Photovoltaic Solar	10.81
St. Louis	MO	63104	2010	Photovoltaic Solar	11.28
St. Louis	MO	63106	2011	Photovoltaic Solar	14.1
St. Louis	MO	63106	2011	Photovoltaic Solar	58.515
St. Louis	MO	63106	2011	Photovoltaic Solar	18.095
St. Louis	MO	63104	2011	Photovoltaic Solar	12.925
St. Louis	MO	63104	2011	Photovoltaic Solar	20.68
St. Louis	MO	63106	2011	Photovoltaic Solar	35.25
St. Louis	MO	63106	2011	Photovoltaic Solar	22.09
St. Louis	MO	63106	2011	Photovoltaic Solar	17.39
St. Louis	MO	63106	2011	Photovoltaic Solar	96
St. Louis	MO	63110	2010	Photovoltaic Solar	99.8
St. Louis	MO	65072	2011	Photovoltaic Solar	10.81
Desoto	MO	63020	2010	Photovoltaic Solar	10.34
Fenton	MO	63026	2011	Photovoltaic Solar	10.8
Fredericktown	MO	63645	2010	Photovoltaic Solar	13
St. Louis	MO	63141	2011	Photovoltaic Solar	10.58
Pacific	MO	63069	2010	Photovoltaic Solar	40
Farmington	MO	63640	2011	Photovoltaic Solar	13.44
St. Louis	MO	63110	2011	Photovoltaic Solar	25.2
Total					861.381

S-RECs associated with this generation are metered and not paid for until March of the year following generation. The generation from these installations totaled 380 MWhs for the CY 2011 and were paid in February and March, 2012.
These S-RECs are entitled to the 1.25 in state factor.

Exhibit 1
Ameren Missouri
Headquarters Solar Generation Facility
100 kW
Generation CY 2011

Meter Reading (kWhs)	Meter Number						Total
Month	<u>2812523</u>	<u>2832563</u>	<u>2849551</u>	<u>3454295</u>	<u>10263066</u>	<u>11348158</u>	<u>kwhs</u>
Jan			142.30	278.17		4036.75	4457.22
Feb			165.20	191.82		5582.12	5939.14
Mar			172.22	322.75		7881.64	8376.61
Apr			172.87	392.4		11593.86	12159.13
May			211.06	400.93		12498.36	13110.35
Jun			285.06	435.00		13299.03	14019.09
Jul			242.70	465.32		13691.73	14399.75
Aug			239.84	476.41		12365.76	13082.01
Sep			193.69	385.42		8638.31	9217.42
Oct			195.93	443.72		7915.34	8554.99
Nov	2077.43	117.73	60.56	135.52	51.45	2504.33	4947.02
Dec	3995.02	270.53	0.00	0.00	118.48	0.00	4384.03
Total	6072.45	388.26	2081.43	3927.46	169.93	100007.23	112646.8

These 113 S-RECs are entitled to the 1.25 in-state factor.

Exhibit 2

Pioneer Prairie Resource Affidavit

AFFIDAVIT

I, Steve Irvin, Executive Vice President, Central Region, as the authorized representative of Pioneer Prairie Wind Farm I LLC, a Delaware limited liability company ("Seller") declare that Seller hereby sells, transfers and delivers to Union Electric Company d/b/a AmerenUE ("Buyer") the Product (including, unless otherwise specified, all Environmental Attributes and Product Reporting Rights) associated with the generation and delivery of energy from the Renewable Energy Facility as described below, in the amount of one REC for each megawatt hour generated as Delivery of Product, as said term is defined in the Power Purchase Agreement between Buyer and Seller dated June 10, 2009 (initially capitalized terms used and not otherwise defined herein are defined in the Power Purchase Agreement), and that the RECs sold hereunder:

- 1) were generated by the following Renewable Energy Facilities and sold, subject to receipt of payment, to Buyer;
- 2) are solely and exclusively owned by Seller;
- 3) have not been used by Seller or any third party to meet the RPS or other Applicable Program requirements in another state or jurisdiction;
- 4) were generated in Missouri or an Adjacent State and complied with applicable energy delivery rules;
- 5) were not sold to any end-use customer or other wholesale provider other than Buyer during the calendar/Reporting Year;
- 6) were not used on-site for generation;
- 7) no Environmental Attributes (including, without limitation, any verified emission reductions) associated with the RECs sold hereunder have been sold or otherwise made available to a third party; and

Generator Name	Technology Type	Fuel Type	Generator Location	# MWh RECs Sold	Generation Period
Pioneer Prairie Wind Farm I LLC	Wind	Wind	IA	88,023	2009
Pioneer Prairie Wind Farm I LLC	Wind	Wind	IA	294,696	2010
Pioneer Prairie Wind Farm I LLC	Wind	Wind	IA	288,483	2011

Pioneer Prairie Wind Farm I LLC is located in Mitchell County, Iowa. The facility's nameplate capacity is 300.3 MW, of which 102.3 MW is sold to Buyer. The Power Purchase Agreement between Buyer and Seller began on September 1, 2009.

This affidavit supersedes and replaces the affidavit signed on March 15, 2012 that erroneously identified EDP Renewables North America LLC as Seller.

As an authorized agent of Seller, I state that the above statements are true and correct to the best of my knowledge.

Steve Irvin
Signature

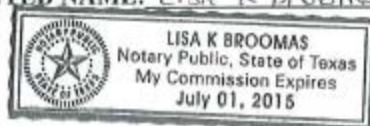
Steve Irvin
Executive Vice President, Central Region

3/23/2012
Date

STATE OF: Texas
COUNTY OF: Harris

This instrument was acknowledged before me on this 23rd day of March, 2012, by
Steve Irvin, Exec VP, Central Region

SIGNATURE of Notary: Lisa K. Broomas
PRINTED NAME: Lisa K Broomas



(NOTARY SEAL)

*MBE
by
RN*

Exhibit 3
Pioneer Prairie REC Meter Readings and Payments

**THIS PAGE IS
CONFIDENTIAL
IN ITS ENTIRETY**

EXHIBIT 4

UNION ELECTRIC COMPANY

ELECTRIC SERVICE

MO.P.S.C. SCHEDULE NO. 5

Original

SHEET NO. 122.14

CANCELLING MO.P.S.C. SCHEDULE NO. _____

SHEET NO. _____

APPLYING TO

MISSOURI SERVICE AREA

Rider SR - Solar Rebate

Purpose

The purpose of the Solar Rebate Rider is to implement the solar rebate established through §393.1030 RSMo and to establish the terms, conditions and procedures which Company will rely on in accepting rebate applications and authorizing rebate checks to eligible participants.

Availability

All retail customers of Company are eligible for the rebate with the following limitations and conditions:

- The retail customer must be an active account on the Company's utility system and in good payment standing.
- The solar electric system must be permanently installed on the retail customer's premise.
- The retail customer must declare the installed solar electric system will remain in place on the account holder's premise for the duration of its useful life which shall be deemed to be a minimum of ten (10) years.
- The solar modules and inverters shall be new equipment and include a manufacturers warranty of ten (10) years.
- The maximum rebate for each premise is \$50,000 irrespective of the number of meters/service points serving the premise.
- The solar electric system or expansion of an existing solar electric system must not become operational until after December 31, 2009. Company will not accept any applications for rebates until January 1, 2010.
- The solar electric system shall meet all requirements of 4 CSR 240-20.065 and Company's "Electric Power Purchases from Qualified Net Metering Units" tariff.

Rebate Application

Company will not accept rebate applications which are incomplete or which are not accompanied by or preceded by an "Interconnection Application/Agreement for Net Metering Systems with a capacity of 100 kW or less". Both the Rebate Application and the Net Metering Application/Agreement can be obtained from Company's web site www.ameren.com.

Customer will be notified in writing, by letter or email, that the rebate application 1) has been accepted or 2) notified of the deficiency resulting in the rebate application not being accepted. Applications accepted by Company will expire after twelve (12) months if the customer has not satisfied the terms of Company's "Electric Power Purchases from Qualified Net Metering Units" tariff or if the solar electric system has not become operational.

Rebate Payment

The amount of the rebate will be \$2.00 multiplied by the combined DC rating of the solar module(s) in Watts from the manufacturer's specification sheet(s).

DATE OF ISSUE December 4, 2009

DATE EFFECTIVE January 3, 2010

ISSUED BY Warner L. Baxter
NAME OF OFFICER

President & CEO
TITLE

St. Louis, Missouri
ADDRESS

Exhibit 4

UNION ELECTRIC COMPANY

ELECTRIC SERVICE

MO.P.S.C. SCHEDULE NO. 5

Original

SHEET NO. 122.15

CANCELLING MO.P.S.C. SCHEDULE NO. _____

SHEET NO. _____

APPLYING TO

MISSOURI SERVICE AREA

Rider SR - Solar Rebate (cont.)

A rebate payment will not be issued until:

- 1) an Interconnection Application/Agreement for Net Metering Systems with Capacity of 100 kW or Less has been executed by the customer and Company,
- 2) a complete Missouri Solar Electric Rebate Application has been accepted by Company and 3) the solar electric system is operational.

Suspension of Rebate Payment

In certain circumstances, Company may be limited in the total amount of rebates that can be issued in a given year in order to comply with the provision of §393.1030 RSMo which limits the retail rate impact resulting from the statute. In the event that Rebate Payments are suspended in a particular year, Company will notify each affected rebate applicant. The accepted but suspended Rebate Applications will be processed in chronological order based on the date the solar electric system became operational.

Solar Renewable Energy Credits (SREC's)

Customer retains ownership of all SREC's created by the operation of the solar electric system.

DATE OF ISSUE December 4, 2009

DATE EFFECTIVE January 3, 2010

ISSUED BY Warner L. Baxter
NAME OF OFFICER

President & CEO
TITLE

St. Louis, Missouri
ADDRESS

Exhibit 5

UNION ELECTRIC COMPANY

ELECTRIC SERVICE

M.O.P.S.C. SCHEDULE NO. 5

Original

SHEET NO. 122.16

CANCELLING M.O.P.S.C. SCHEDULE NO.

SHEET NO.

APPLYING TO

MISSOURI SERVICE AREA

RIDER SP - SREC Purchase

Purpose

The purpose of this tariff is to provide a mechanism for eligible Customers to sell and Company to purchase the Renewable Energy Credits associated with energy generated by solar electric systems operating under Company's Schedule 1 - Electric Power Purchases from Qualified Net Metering Units.

Availability

This tariff is available to any retail electric Customer operating a solar electric system in compliance with Company's approved net metering tariff.

Availability of service under this rider shall be limited by the cumulative total of the actual payment commitments and estimated payment commitments entered into by Company of up to \$2,000,000 with at least \$700,000 (35%) being reserved specifically for commitments under the Lump Sum Offer as described below.

Term

This tariff shall be effective through December 31, 2011, and will terminate thereafter unless modified or extended. In the event that this tariff expires, all commitments made by Company prior to the expiration will be honored for their full term.

Definitions

1. REC - Renewable Energy Credit, or Renewable Energy Certificate means a tradable certificate, that is either certified by an entity approved as an acceptable authority by the commission or as validated through the commission's approved REC tracking system or a generator's attestation and further defined in 4 CSR 240-20.100 Electric Utility Renewable Energy Standard Requirements.
2. SREC - Solar Renewable Energy Credit - A REC produced by a solar electric resource.
3. Retail Account Holder - The customer of record taking service from Company under any of Company's retail electric tariffs.
4. Customer-Generator - the owner, lessee, or operator of an electric energy generation unit that meets all of the following criteria:
 - Is powered by a renewable energy resource.
 - Is located on premises that are owned, operated, leased or otherwise controlled by the party as Retail Account Holder and which corresponds to the service address for the retail account.
 - Has received approval from Company to interconnect with and operate in parallel phase and synchronization with Company's electric distribution system.
 - Meets all applicable safety, performance, interconnection, and reliability standards endorsed by the net metering rule, 4 CSR 240-20.065(1)(C)6 and 4 CSR 240-20.065(1)(C)7.

DATE OF ISSUE November 1, 2010

DATE EFFECTIVE January 1, 2011

ISSUED BY Warner L. Baxter
NAME OF OFFICER

President & CEO
TITLE

St. Louis, Missouri
ADDRESS

Exhibit 5

UNION ELECTRIC COMPANY

ELECTRIC SERVICE

MO.P.S.C. SCHEDULE NO. 5

Original

SHEET NO. 122.17

CANCELLING MO.P.S.C. SCHEDULE NO. _____

SHEET NO. _____

APPLYING TO

MISSOURI SERVICE AREA

RIDER SP - SREC Purchase (Cont.)

5. PVWatts - A program available from the U.S. Department of Energy that estimates the kWh production of a solar electric system based on specific system parameters.
6. Incremental System Capacity - Any additional capacity installed by Customer subsequent to having accepted a payment commitment from Company under either the Lump Sum Offer or the Annual Payment Offer as described below.

Standard Offers

Company will purchase SRECs produced and owned by a Customer-Generator under either the Lump Sum Offer or the Annual Payment Offer listed below based on the DC nameplate capacity of the Customer-Generator's system. Only SRECs produced after the effective date of this tariff are eligible for either Standard Offer. Payments will only be made to the Retail Account Holder.

Lump Sum Offer applies to systems whose installed DC nameplate capacity is less than 10 kW:

- Company will offer to purchase 100% of the SRECs produced during the first 120 calendar months (10 years) following the execution of the agreement or the operational date of the Customer-Generator whichever occurs later.
- The numbers of SRECs produced annually will be determined using PVWatts software with the result rounded to the tenths digit.
- Company will pay \$100.00 per SREC purchased.
- Company will make a single payment up-front for all SRECs purchased over the term of the agreement according to the following formula: Up-Front Payment = Annual SRECs produced x 10 years x SREC price.

Annual Payment Offer applies to systems whose installed DC nameplate capacity is 10 kW or larger but not greater than 100 kW:

- Company will offer to purchase 100% of the SRECs produced during the first 60 calendar months (5 years) following the execution of the agreement or the operational date of the Customer-Generator whichever occurs later.
- Customer-Generator must make provisions for Company to meter all energy produced by the system. The numbers of SRECs produced annually will be determined by those meter readings with total SRECs available for purchase being kWh energy divided by 1,000 with the result rounded to the tenths digit.
- Company will pay \$100.00 per SREC purchased.

DATE OF ISSUE November 1, 2010

DATE EFFECTIVE January 1, 2011

ISSUED BY Warner L. Baxter
NAME OF OFFICER

President & CEO
TITLE

St. Louis, Missouri
ADDRESS

Exhibit 5

UNION ELECTRIC COMPANY

ELECTRIC SERVICE

MO.P.S.C. SCHEDULE NO. 5

Original

SHEET NO. 122.18

CANCELLING MO.P.S.C. SCHEDULE NO. _____

SHEET NO. _____

APPLYING TO

MISSOURI SERVICE AREA

RIDER SP - SREC Purchase (Cont.)

- Company will make payments annually no later than March 31 based upon actual SRECs produced as measured by meter readings ending approximately December 31 of the immediately preceding year. This will result in six (6) payments over the five (5) year term for most agreements with the first and last payment being for less than a full twelve (12) month period according to the following formula: Annual Payment = SRECs produced in previous calendar year x SREC price.

• Incremental System Capacity

When a Customer adds Incremental System Capacity, Company will make an offer to purchase the SRECs associated with only the Incremental System Capacity.

- If the total capacity of the system remains eligible for the Lump Sum Offer, then Company will provide a Lump Sum Offer for the Incremental System Capacity.
- If the Incremental System Capacity results in a total capacity that exceeds the capacity limit of the Lump Sum Offer, then the Annual Payment Offer will apply to the Incremental System Capacity. The number of SRECs purchased under the Annual Payment Offer will be the total number of SRECs produced by the system less any SRECs already purchased under the Lump Sum Offer during the same period.

Ownership Change

If the Retail Account Holder associated with a Customer-Generator facility that has received payment under the Lump Sum Offer changes during the term of an agreement, the new Retail Account Holder will not be eligible for a contract until such time as the term of the existing Lump Sum Offer has expired.

If the Retail Account Holder associated with a Customer-Generator facility that has entered into an agreement under the Annual Payment Offer changes during the term of the agreement, the original Retail Account Holder will receive payment for all SRECs produced prior to the change and waives all rights to payment for SRECs produced after the change. Payments associated with SRECs produced subsequent to the change in the Retail Account Holder will be made to the new Retail Account Holder.

DATE OF ISSUE November 1, 2010

DATE EFFECTIVE January 1, 2011

ISSUED BY Warner L. Baxter
NAME OF OFFICER

President & CEO
TITLE

St. Louis, Missouri
ADDRESS

Exhibit 5

UNION ELECTRIC COMPANY ELECTRIC SERVICE

MO.P.S.C. SCHEDULE NO. 5 Original SHEET NO. 122.19

CANCELLING MO.P.S.C. SCHEDULE NO. _____ SHEET NO. _____

APPLYING TO MISSOURI SERVICE AREA

RIDER SP - SREC Purchase (Cont.)

Contract/Offer

Company will only accept a request for a standard offer contract if the Customer-Generator has submitted and Company has accepted a completed application for net metering service.

Company will provide a commitment to Customer for either the Lump Sum Offer or the Annual Payment Offer provided that Company's cumulative total of the actual payment commitments and estimated payment commitments have not exceeded the amount(s) indicated under "Availability".

For a Customer-Generator that is not yet operational (new systems), Company's commitment will be presented to Customer upon acceptance by Company of Customer-Generator's design. For a Customer-Generator that is already operating under Company's Schedule 1 - Electric Power Purchases from Qualified Net Metering Units, Company's commitment will be presented to Customer within ninety (90) days of the effective date of this tariff.

Company's commitment will expire after six (6) months if any of the following conditions have not been met: 1) the Customer-Generator has not become operational or 2) the Customer has not executed and returned the agreement or 3) Customer-Generator has not satisfied the metering requirements of the Annual Payment Offer.

Company will enter into an agreement and initiate the Lump Sum Offer or the Annual Payment Offer only after the Customer-Generator has become operational.

In the event that Company ceases entering into new agreements as a result of meeting the cumulative total payment commitment referenced above and subsequently authorizes additional expenditures, Customer-Generators that became operational but did not receive an offer will be given the opportunity to participate under this tariff in the order that they became operational.

Inquiries related to this tariff, net metering service and Rider SR - Solar Rebate should be made to:

One Ameren Plaza
1901 Chouteau Avenue
P.O. Box 66149, MC 611
St. Louis MO 63103
Att: General Executive, Renewables

General Rules & Regulations

In addition to the above specific rules and regulations, all of Company's General Rules and Regulations shall apply to the supply of service under this rider.

DATE OF ISSUE November 1, 2010 DATE EFFECTIVE January 1, 2011
ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
NAME OF OFFICER TITLE ADDRESS

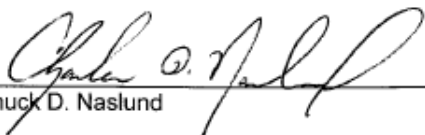
Exhibit 6

AFFIDAVIT OF COMPLIANCE WITH 2011 COMPLIANCE PLAN

COMES NOW Chuck D. Naslund, affiant, being of legal age, and upon being first duly sworn on his oath, states:

1. I am Senior Vice President, Generation & Environmental Projects, for Union Electric Company d/b/a Ameren Missouri. My business address is One Ameren Plaza, 1901 Chouteau Avenue, St. Louis, Missouri 63103.
2. As Senior Vice President, Generation & Environmental Projects, I am responsible for ensuring Ameren Missouri's compliance with the Renewable Energy Standard (RES).
3. I certify that Ameren Missouri is in compliance with the RES compliance plan filed in April of 2011 for the calendar year 2011.
4. I hereby swear and affirm that the information contained in this Affidavit is true and correct.

Further, affiant sayeth not.



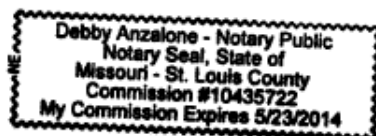
Chuck D. Naslund

Subscribed and sworn to before me this 10th day of April, 2012.



Notary Public

My commission expires:



**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Ameren Missouri's)
Submission of its 2011 RES) Case No. EO-2012-0351
Compliance Report and 2012-2014)
Compliance Plan)

MISSOURI DEPARTMENT OF NATURAL RESOURCES' COMMENTS

The Missouri Department of Natural Resources (MDNR), pursuant to 4 CSR 240-20.100, respectfully submits the following comments in response to the 2011 Compliance Report and 2012 Compliance Plan of Ameren Missouri.

In passing Proposition C, Missouri voters communicated their interest in more renewable energy than had been previously developed in Missouri by 2008. This first set of filings demonstrates that Missouri's renewable energy standard is not creating significant additional renewable energy development. While the 2011 Compliance Reports and 2012 Compliance Plans may comply with the Commission's rules, the results are disappointing to say the least, from a policy perspective. This is largely due to the fact that the utilities are counting pre-existing hydropower and aged renewable energy credits (RECs)--those generated before the first compliance year. MDNR once again recommends additional examination to clarify how to apply the standard to hydropower and how to "count" the three-year life of RECs.

Ameren's RES Compliance Plan for 2012-2014, page 17, states:

"All generating facilities utilized by Ameren Missouri to meet the requirements of the Missouri RES *have been certified* by the MDNR in accordance with 10 CSR 140-8.010(4)." (*Emphasis added.*) MDNR has certified all generating facilities Ameren reports in its RES Compliance **Report for 2011**. However, MDNR has not received an application from Ameren for certified generating facilities identified in Ameren's Compliance **Plan for 2012-2014** that will be used in these years. While it expects to receive an application from Ameren for such facilities in a timely manner, MDNR wanted to clarify this point.

Respectfully submitted,

CHRIS KOSTER
Attorney General

/s/ Jennifer S. Frazier
Jennifer S. Frazier
Deputy Chief Counsel
Agriculture & Environment Division
P.O. Box 899
Jefferson City, Missouri 65102
Bar No. 39127
573-751-8795
573-751-8796 (fax)
jenny.frazier@ago.mo.gov
**Attorney for Missouri Department of
Natural Resources**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 31st day of May, 2012.

/s/ Jennifer S. Frazier

Jennifer S. Frazier
Deputy Chief Counsel
Agriculture & Environment Division

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Ameren Missouri's Request for a Waiver)
Regarding its Renewable Energy Standard Compliance.) Case No. EO-2012-0351

RESPONSE TO COMMENTS

COMES NOW Union Electric Company d/b/a Ameren Missouri (Company or Ameren Missouri), and in response to the comments filed by the Missouri Department of Natural Resources (DNR), Renew Missouri, et al (Renew Missouri), and Wind on the Wires, et al (Wind on the Wires), respectfully states:

1. On April 16, 2012, Ameren Missouri submitted its Renewable Energy Standard (RES) Compliance Plan (RES Plan) for calendar years 2012 through 2014 and its RES Compliance Report (RES Report) for 2011.

2. On May 31, 2012, DNR, Renew Missouri, Wind on the Wires filed Comments on Ameren Missouri's RES Plan. In addition, the Staff of the Missouri Public Service Commission (Staff) filed its Report on the Company's RES Plan and RES Report.

STAFF REPORT

3. The Staff Report found no deficiencies with either the RES Plan or the RES Report, although it did identify a variance that Ameren Missouri requested in its previous RES Plan filing and which it should have requested in this filing. That is, a variance from 4 CSR 240-20.100(7)(B)1F, the portion of the Commission's rules which requires the Compliance Plan to provide a "...detailed explanation of RES retail impact limit calculated in accordance with section (5) of this rule." Section (5) of the rule requires a highly detailed calculation of a revenue requirement which excludes renewable energy sources and includes costs associated

with greenhouse gas costs. The impact of these adjustments is that the calculation, by design, produces a larger revenue requirement than the Company's last Commission approved revenue requirement. As was true in the Company's filing last year, Ameren Missouri's cost to comply with the RES for this year and the next two calendar years is significantly less than 1% of its current revenue requirement. Accordingly, the extra calculations are not necessary to ensure Ameren Missouri's compliance plan is obtainable within the statutory expenditure cap for 2011, 2012 and 2013. Ameren Missouri requests the Missouri Public Service Commission (Commission) grant it a variance from 4 CSR 240-20.100(7)(B)1F and, instead, allow the Company to demonstrate that the costs of RES compliance is less than 1% of its last Commission ordered revenue requirement. The Company also requests that this variance be a continuing variance until such time as the cost of compliance is more than 1% of its current revenue requirement.

DNR

4. DNR's comments do not allege that Ameren Missouri is in violation of the RES or the related Commission regulations. In fact, DNR certified all of the renewable energy sources as set forth in the Company's RES Report. DNR's comments do point out that Ameren Missouri had yet to seek certification for any new renewable generating facilities identified in its RES Plan. This is true and the Company will seek certification after the new renewable generation facility in Maryland Heights, Missouri is operational, as is appropriate.

5. DNR's second comment was more significant. DNR states, "In passing Proposition C, Missouri voters communicated their interest in more renewable energy than had been previously developed in Missouri by 2008. This first set of filings demonstrates that

Missouri's renewable energy standard is not creating significant additional renewable energy development."

6. The Company takes issue with this statement. There is no basis to believe that Missouri voters voted for "more renewable energy." The RES does not require any utility to add any amount of new renewable energy. It only sets forth the percentage of energy generation (or an associated level of RECs) which must come from renewable energy sources. This can be demonstrated by looking at the ballot initiative as well as by examining the law itself.

5. The ballot initiative did not use the word new. It read, "Shall Missouri law be amended to require investor-owned electric utilities to generate or purchase electricity from renewable energy sources such as solar, wind, biomass and hydropower with the renewable energy sources equaling at least 2% of retail sales by 2011, increasing incrementally to at least 15% by 2021, including at least 2% from solar energy; and restricting to no more than 1% any rate increase to consumers for this renewable energy?"¹

6. Beyond the ballot initiative, the more detailed language of the RES itself does not require new renewable energy sources. The statute requires Ameren Missouri to generate or purchase electricity (or to purchase Renewable Energy Credits, known as RECs) from renewable energy resources at a level that constitutes a set portion of its sales. The percentage required for 2011 was two percent. Ameren Missouri already had enough renewable generation to comply with the two percent requirement. The fact that the Company was in compliance without making additional expenditures is not a failure or a shortcoming of any type. In fact, rather than bemoan this reality, the state should view this as a positive as it demonstrates that the Company's customers have been receiving the benefits of renewable energy for many years.

¹ EO-2011-0275, Erratum of Renew Missouri, September 2, 2011, p. 2.

7. Finally, the Company would note that it has brought on new renewable generation in order to comply with the future, increasing requirements and the solar specific requirements of the RES. Ameren Missouri is testing different solar technologies at its St. Louis offices and making the information it gathers available to customers on its website. The Company purchases solar RECs from its customers with solar generation. The Company will place in service a facility that converts landfill gas to electricity. This facility is the first of its kind in Missouri and represents a positive step in the development of renewable energy in Missouri. The Company would not dismiss these developments as unimportant, as the comments of DNR could be interpreted to do.

RENEW MISSOURI AND WIND ON THE WIRES

7. Renew Missouri and Wind on the Wire (together, Renewable Businesses) allege the same three violations of the RES, none of which have any foundation which would allow the Commission to adopt their interpretation and each of which would require the Commission to change its governing regulations, a process that cannot occur in this case. The Commission should recognize that the Renewable Businesses have a business interest in forcing Ameren Missouri (and other utilities) to purchase renewable energy from them and look upon this statute as a way to pass along the costs of their business to utility customers, regardless of whether that cost is the best way to serve utility customers. In this case, for example, banking RECs for three years beginning in 2008 (discussed more below) is consistent with the statutory language and prevents the flow of additional costs (without additional benefit) to Ameren Missouri's customers. This is not to say that the comments of the Renewable Businesses should be ignored, but they certainly should be viewed through the appropriate lens.

REC BANKING START DATE

8. The first issue raised by the Renewable Businesses is when Ameren Missouri can begin banking RECs to use for future compliance. The Renewable Businesses take the position that banking cannot start until January of 2011 while the Company believes that authority began in 2008.

9. The Renewable Businesses do not deny that the Commission's rules allow utilities in Missouri to bank RECs for three years.² Nor does their argument deny that the statute does not provide a start date for that banking. Additionally, the Commission's rules do not explicitly contain a date before which the initial banking may not occur. However, because the statute limits REC banking to three years, it creates a natural start date of January 1, 2008 (as the requirement to provide a percentage of a utility's electric power from renewable resources began January 1, 2011). For the Commission to now restrict banking to less than three years is not supported by the language of the law and would effectively punish Ameren Missouri for its early investment in renewable energy. Under the Renewable Businesses interpretation, Ameren Missouri could use RECS associated with renewable generation in 2011 to comply with its RES requirements in 2014, but not use RECs associated with 2008 renewable generation to comply with 2011 RES requirements. This distinction does not appear in the law and the Commission should resist the call, based solely upon the economic interest of the parties promoting it, to impose such a limitation.

10. The Renewable Businesses attempt to tie the start date for banking to the start date of the RES portfolio requirement. Again, there is no basis for this tie. RECs were not

² 4 CSR 240-20.100(1)(J).

created by this law; RECs existed prior to this law.³ The Office of the Public Counsel agrees with Ameren Missouri's interpretation. In his opening statement at the hearing held in Case No. EO-2011-0275 (0275), the Public Counsel explained this issue as follows:

For example, and I'm just looking at the definitions in Chapter 386. 386 defines "sewer system" as pipes, pumps, canals, lagoons, et cetera, et cetera, et cetera. It doesn't anywhere explicitly say that it means pipes placed into service or pipes manufactured after the effective date of the statute." He continued, "[I]f you look at a statute, any statute, for example, if the puppy mill statute had created a definition of a kennel, a kennel manufactured before the date of the statute that meets the definition is a kennel...[T] statute doesn't create a kennel any more than it creates a REC. RECs existed; the statute simply recognizes what can be done with them, even though they existed before the statute existed."⁴

11. Renew Missouri also argues that retroactive REC banking should not be allowed because it violates the requirement that renewable energy must "constitute" a portion of sales for a given time period.⁵ However, Renew Missouri ignores language in that same portion of the statute which follows the language they quote which explicitly allows the utility to comply in whole or in part by using RECs. "A utility may comply with the standard in whole or in part by purchasing RECs."⁶ If the law explicitly says RECs can be used as a method of compliance, the rest of the statute cannot be read to exclude RECs as a method of compliance.

12. The Commission Staff in their response to Renew Missouri in 0275, points out that Renew Missouri fully participated in the Commission's rulemaking proceeding and did not offer any comment on whether banking should or should not be allowed, nor did it comment on what specific date banking should be allowed to begin.⁷ Staff's comments tracked through the

³ For example, Ameren Missouri has been purchasing RECs for several years for its Pure Power program.

⁴ Case No. EO-2011-0275, Tr. p. 150, l. 13 through p. 151, l. 5.

⁵ Section 393.1030.1 RSMo.

⁶ Id.

⁷ Case No. EO-2011-0275, Staff Response to Comments of Renew Missouri, p. 7-8.

four different versions of this portion of the Commission regulations, even pointing to the fact that the question was raised as to which year banking should begin, and Renew Missouri did not raise a concern with it starting in 2008. It was only after Renew Missouri realized that banking would remove the need for utilities to purchase RECs from the solar and wind businesses which it represents did the 2008 start date become a concern and a misinterpretation of the statute.

QUALIFICATION OF KEOKUK AS A RENEWABLE ENERGY RESOURCE

13. The Renewable Businesses allege that the Keokuk hydroelectric plant should not be counted as a renewable energy resource, despite the clear language of the RES statute. The Renewable Businesses' arguments ignore the on-point and controlling law; that is, the explicit language of the statute. The statute uses the phrase "nameplate rating." As is discussed in detail below, that term is specific to a generator rather than to a plant. This fact is confirmed in DNR's rules, which establishes that any hydroelectric "generator" that has a "nameplate rating" of ten (10) megawatts or less is a renewable energy resource.⁸ Also consistent with the definition found in the RES statute, the Commission's rules define a "Renewable Energy Resource" as including "Hydropower...that has generator nameplate ratings of ten (10) megawatts or less."⁹

14. The statute and the rules refer to the "nameplate rating" of each generator in a power plant because **only generators have nameplate ratings**. This is borne out by standard industry usage of the phrase "nameplate rating." For example, the Edison Electric Institute's (EEI) Glossary of Electric Industry Terms defines "nameplate rating" as "The full-load continuous rating of a generator prime mover or other electrical equipment under specified conditions as designated by the manufacturers. It is usually indicated on a nameplate attached

⁸ 10 CSR 140-8.010(2)(A)8.

⁹ 4 CSR 240-20.100(1)(K)(8) and Section 393.1025(5).

mechanically to the individual machine or device.”¹⁰ The Keokuk Plant contains 15 generators, each of which has a different nameplate attached, as shown by the pictures of the nameplate attachments of two of the generators, included in Exhibit 1 to this Response. Nameplate rating does not, as the Renewable Businesses assert, commonly mean an aggregate rating for the entire power plant.

15. Both the Commission’s rules and DNR’s rules contain definitions which make it clear that one is to look at the nameplate rating of each generator in use at a given plant site. There is nothing in the statute nor in these rules that requires aggregation of the nameplate ratings from multiple generators, or that even suggests that such aggregation is appropriate. The EEI glossary also defines “generator,” as follows: “A machine which transforms mechanical energy into electric energy.”¹¹ *Webster’s Dictionary* has a very similar definition: “A machine by which mechanical energy is changed into electrical energy.”¹² A power plant is not a “machine.” A power plant is comprised of buildings, structures, machinery, roads, fences, and other components. A “generator,” however, is a machine, and it is the generator and the generator alone that changes mechanical energy into electrical energy. Ameren Missouri relied upon the Commission and DNR definitions to direct its RES compliance efforts. The Commission cannot change the rules under which the Company must comply AFTER the compliance period has ended. The Commission cannot change it’s, or DNR’s, definition of what qualifies as renewable hydropower as is being suggested by the Renewable Businesses.

16. Renew Missouri, in offering nothing more than a cut-and-paste from its comments from a year ago, cites various non-controlling sources in its attempt to support its argument, but

¹⁰ Edison Electric Institute, Glossary of Electric Industry Terms, April 2005 p. 99.

¹¹ *Id.*, p. 714.

¹² Merriam-Webster, 2011.

reliance on those sources is inappropriate. In fact, at times, the citation made by Renew Missouri doesn't support its assertion of what "nameplate rating" means. For the most part, Renew Missouri presents definitions of the phrase "nameplate capacity" without demonstrating why it is an equivalent term to "nameplate rating." Under questioning from the Commission, the attorney for Renew Missouri admitted that the RES statute does not use the phrase "nameplate capacity."¹³ If anything might be taken from Renew Missouri's comments, it could be that "nameplate capacity" refers to the entire plant while "nameplate rating" refers to a specific generator (although some of the citations tie even "nameplate capacity" to a single generator). Either way, the statute does not use the phrase "nameplate capacity."

The first three footnotes in Renew Missouri's comments cite to articles by the Energy Information Administration, the US Department of Interior and the Rocky Reach Hydro Project. Clearly, in each, the reference is to "nameplate capacity." These articles, while interesting, do not address or otherwise offer anything definitive to the discussion of how "nameplate rating" should be interpreted. These three citations were also included in Renew Missouri's comments in 0275 and the fact that they do not use the word "nameplate rating" was brought out by the Commission at the 0275 hearing.¹⁴

The fourth footnote in Renew Missouri's comments is a repeat of footnote three, an error pointed out by the Commission in the 0275 hearing and not corrected by Renew Missouri in its current comments.¹⁵

The fifth footnote in Renew Missouri's comments is to a website named Expert Glossary. As pointed out by the Commission in 0275, Renew Missouri's comments left out key portions of

¹³ Case No. EO-2011-0275, T. p. 45, l. 15-20.

¹⁴ Id., p. 52, l. 3-17.

¹⁵ Id., p. 52, l. 18-23.

the definition. Specifically, the definition is specific to a generator, not to the entire plant. Renew Missouri cites the definition as “full-load rating,” while the definition in its entirety says, “The full-load continuous rating **of a generator**, prime mover, or other electric power production equipment under specific conditions as designated by the manufacturer. **Installed generator nameplate rating is usually indicated on a nameplate physically attached to the generator.** (Emphasis added). This definition is consistent with the definition adopted by the Commission and by DNR and is the opposite of what Renew Missouri claims the definition says. This discrepancy was brought out at the 0275 hearing¹⁶ but ignored by Renew Missouri in its current comments.

The sixth footnote is to the Texas PUC’s rules for the Registration of Power Generation Companies and Self-Generators. In the definition section, there is a specific definition of “nameplate rating.” That definition reads, “The full-load continuous rating **of a generator** under specified conditions as designated by the manufacturer.” (Emphasis added). Again, this definition was pointed out to Renew Missouri at the 0275 hearing,¹⁷ but it is again mis-cited in Renew Missouri’s comments in this case. Another section of this document discusses “capacity ratings” and defines them as including “Renewable resource generating units...rated at the nameplate rating.” This is more supportive of the Commission and DNR’s definitions than of Renew Missouri’s arguments. Again, pointed out by the Commission in the 0275 case¹⁸ and, again, the exact opposite of the interpretation Renew Missouri wants this Commission to adopt in this case.

¹⁶ Id., p. 54, l. 10 through p. 57, l. 8.

¹⁷ Id., p. 57, l. 17 through p. 60, l. 3.

¹⁸ Id., p. 60, l. 12 though p. 61, l. 9.

The seventh footnote is to the Clean Energy Data Book, which uses the phrase “nameplate capacity” but does not provide a definition of it or of “nameplate rating.”

The eighth footnote is to an Ameren Public Power Association’s Annual Directory & Statistical Report, which contains no definition of “nameplate rating” or “nameplate capacity” at all.

17. Renew Missouri continues on to cite several court cases that it claims demonstrate the argument that “nameplate rating” or “nameplate capacity” means the entire plant rather than one generator. A review of the cited cases reveals that, again, Renew Missouri’s point is not supported by the cases cited.

In Don’t Waste Oregon Committee v. Energy Facility Siting Council,¹⁹ a case dealing with natural gas plants rather than hydro-electric plants, the court does not use the phrase “nameplate rating” but instead discusses the “nameplate capacity” of two plants together. The court defined “total generating capacity” as “...the sum of the electricity that the plant can bring for sale to the power grid plus the electricity required to operate the plant – and is referred to as the nominal or nameplate capacity.” This, coupled with the definition of “nameplate rating provided by Ameren Missouri,” disproves Renew Missouri’s argument that “nameplate rating” and “nameplate capacity” are synonymous terms.

In Portland General Electric Co. v. State Tax Commission,²⁰ the reference is to “nameplate capacity in kilowatts of the generation facilities,” indicating that the terms “nameplate rating” and “nameplate capacity” are not synonymous terms.

¹⁹ 320 Or. 132, 881 P.2d 119, 124 (1994).

²⁰ 249 Or. 239, 437 P.2d 827, 829 (1968).

In Philadelphia Corp. v. Niagara Mohawk Power Corp.,²¹ the court explicitly referenced the “nameplate capacity of the plant.” Again, breaking the claim of Renew Missouri that “nameplate rating” and “nameplate capacity” have the same meaning.

In State ex rel. Utilities Commission v. Edmisten,²² even as cited by Renew Missouri, clearly is citing the “nameplate capacity” of multiple plants.

In Madison Gas & Electric Co. v. USEPA,²³ the court defines “nameplate capacity” as “capacity figure stamped on a generating unit by its manufacturer and includes the capacity necessary to power the unit itself.” This is consistent with the Commission’s and DNR’s definition and appears to contradict the argument being asserted by Renew Missouri.

Not a single one of these definitions or case citations proves Renew Missouri’s point and the majority of them are supportive of the current Commission and DNR definition. Nameplate rating deals with a generator, not with the entire hydro plant.

18. While the Company believes that the definitions contained in the RES statute are clear, if there was ambiguity, it has now been resolved in the rule adoptions by the Commission and DNR. Both adopted their rules pursuant to the statutory process for adopting rules including publication, notice and a hearing. Renew Missouri participated in the Commission rulemakings and chose not to participate in the DNR rulemaking. Renew Missouri did not oppose the proposed definitions and thus missed their opportunity to argue for a different definition of renewable energy resource. They are attempting to use Ameren Missouri’s RES Plan as a vehicle to reargue the rules, something which cannot be done in this case.²⁴

²¹ 723 N.Y.S.2d 549, 550-1 (A.D. 2001).

²² 40 N. C.App 109, 252 S.E.2d 526, 529 (1979).

²³ 25 F.3d 526, 529 (7th Cir. 1994).

²⁴ However, given the language in the RES statute, adoption of a different definition for renewable energy resources in the rules would not have been permissible even if Renew Missouri had proposed such a definition.

19. Renew Missouri also cites another portion of the RES statute, which contains an exemption applicable to The Empire District Electric Company (Empire), in an attempt to provide an analogy as to why the aggregation of the nameplate ratings of all the generators at a plant site should be used instead of the nameplate rating of each generator. The RES statute says the exemption applies to a utility that “...achieves an amount of eligible renewable technology nameplate capacity equal to or greater than fifteen percent of such corporation’s total owned fossil-fired generating capacity...”²⁵ Renew Missouri argues that “nameplate capacity” in this context refers to the aggregate of the nameplate ratings of all of the utility’s generators, even without directly saying so, and we agree – that phrase does refer to the aggregate capacity of the utility, because given what this particular provision is trying to do, it must. Indeed, this provision proves our point because Renew Missouri ignores that quoted portion of Section 393.1050 itself *applies to a utility as a whole*. Consequently, the provision makes no sense unless a comparison of the “total” nameplate capacity of the utility as a whole is made to the “total” fossil fuel capacity of the utility as a whole. In other words, a *utility’s* “nameplate capacity” has to be the sum of the nameplate ratings for all of that utility’s generators. In contrast, the definitions of “renewable energy resource” discussed above were not promulgated by reference to a utility as a whole, and there is nothing in those definitions that suggests aggregation of the nameplate ratings of multiple generators within a single power plant, or across a utility’s system as a whole.

20. In summary, Comments of the Renewable Businesses are not, as they should be, a commentary on whether Ameren Missouri’s RES Plan meets the requirements of the statute and rules. Rather, their Comments are an attempt to convince the Commission to adopt definitions

²⁵ Section 393.1050 RSMo.

different from those contained in the statute. Ameren Missouri's RES Plan is an explanation of how Ameren Missouri intends to comply with the law *as written*. Ameren Missouri is not required to comply with the law as Renew Missouri wishes it had been written.

UNBUNDLED RECS

21. The Renewable Businesses complain that Ameren Missouri purchased RECs from solar producers located outside of Missouri in order to satisfy the solar set-aside portion of the RES. They point to the portion of the statute that states "the portfolio requirements shall apply to all power sold to Missouri consumers..."²⁶ and argue that means that only Missouri renewable power qualifies under the statute. They misread the statutory language. The portfolio requirement is the percentage that is multiplied by the amount of power the utility generates or purchases to serve Missouri consumers in order to determine the amount of renewable generation (or RECs) needed. So the amount of power generated or purchased to serve Ameren Missouri's customers is multiplied by 2 percent for 2011. That result is the amount of renewable generation or RECs (as the next sentence in the statute explicitly allows) which Ameren Missouri is required to obtain. The interpretation of the Renewable Businesses would moot the sentence about RECs because they could never be used to comply with the statutory requirements.

22. Further, to adopt this interpretation would be nonsensical because it would render meaningless the portion of the statute which awards Missouri based renewable generation to count as 1.25 KWhs for purposes of compliance. If all generation had to be located in Missouri, there would be no need to establish an incentive to use Missouri based generation. Again, it is the economic interests of the Renewable Businesses driving this argument rather than a careful examination of the language of the law.

²⁶ Section 393.1030.1

23. As the Commission is aware, this argument has previously been resolved. The interpretation that ties RECs to energy production was rejected by JCAR,²⁷ prompting the Commission to withdraw that portion of the rules²⁸ and has further been rejected by the Cole County Circuit Court.²⁹ The Company asks the Commission to take administrative notices of these documents.

24. Finally, as is true of the majority of the other arguments made by the Renewable Businesses, this comment would require the Commission to modify its rules. There is no requirement for the renewable energy resources to be located in Missouri. The sole question before the Commission in this case is whether Ameren Missouri has complied with the RES statute and rules interpreting the RES statute as written.

CONCLUSION

25. The issue before the Commission in this case is not whether a rule should be changed or even if a rule could be changed to better suit the economic interest of any individual or group of renewable energy businesses. The issue is whether or not Ameren Missouri has complied with the RES statute and its RES regulations for 2011.

WHEREFORE, Ameren Missouri asks the Commission to find its 2011 RES Report and its 2012-2014 RES Plan are consistent with Missouri law.

²⁷ EX-2010-0169, JCAR letter to Missouri Secretary of State, July 1, 2010.

²⁸ EX-2010-0169, Order Withdrawing Geographic Sourcing Provisions (2)(A) and (2)(B) of 4 CSR 240-2-.100 Pursuant to the Actions of JCAR.

²⁹ State ex rel. MEDA, MIEC, Empire Dist. Electric Co. & AmerenUE v. MPSC, Nos. 10AC-CC00511, 10AC-CC00512, 10AC-CC00513 & 10AC-CC00536 (Cole Co. Cir. Ct., December 27, 2011).

Respectfully Submitted,

/s/ Wendy K. Tatro

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**ATTORNEYS FOR UNION
ELECTRIC COMPANY d/b/a
AMEREN MISSOURI**

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 15th day of June, 2012, to all parties on the Commission's service list in this case.

/s/ Wendy K. Tatro